Unofficial Comment Form

Project 2022-02 Uniform Modeling Framework for IBR

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2022-02 Uniform Modeling Framework for IBR** by **8 p.m. Eastern, Friday, May 16, 2025.   
 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2022-02ModificationstoTPL-001-5-1andMOD-032-1.aspx). If you have questions, contact Senior Standards Developer, [Jordan Mallory](mailto:jordan.mallory@nerc.net) (via email) or at 470-479-7538.

## Background Information

As the penetration of distributed energy resources (DERs) continues to increase across the many distribution systems connected both directly and indirectly to the North American Bulk-Power System (BPS), it is necessary to account for the potential impacts of DERs on reliability in the planning, operation, and design of the Bulk Electric System (BES). The North American Electric Reliability Corporation (NERC) System Planning Impacts of Distributed Energy Resources Working Group (SPIDERWG) has identified the need for improved modeling of aggregate DER for planning studies (including both utility-scale and retail-scale DER) conducted by Transmission Planners (TPs) and Planning Coordinators (PCs), including updated modeling data requirements specific to DER.

Further, in Order No. 901 issued October 2023, The Federal Energy Regulatory Commission (FERC) directed the development of Reliability Standards to address concerns “related to Inverter-based Resources (IBRs) at all stages of Interconnection, planning, and operations.” (Id. at P 25). Among other things, FERC directed NERC to develop requirements addressing the provision of IBR and DER data to the entities responsible for the planning and operation of the BPS. More information on the specific FERC Order No. 901 directives addressed through this project is available in the Project 2022-02 Consideration of Order No. 901 Directives.

Proposed Reliability Standard MOD-032-2 replaces the Load-Serving Entity (LSE) as an applicable entity with the Distribution Provider (DP) and updates Attachment 1: Data Reporting Requirements with data specific to DERs and IBRs, consistent with the FERC Order No. 901 directives. Proposed Reliability Standard MOD-032-2 also adds a new Part 1.2 in Requirement R1, which would require the PC and TP to include in their data requirements and procedures requirements for model submissions in accordance with the Criteria for Acceptable Models List maintained by the Electric Reliability Organization (ERO), which is NERC. New Requirement R2 Part 2.1 addresses estimation of unregistered IBR or DER data where actual data is not available, consistent with Order No. 901 directives.

Revisions in the TOP and IRO data specification standards specify that entities responsible for developing and distributing data specifications shall include requirements for model submissions in accordance with the Criteria for Acceptable Models List maintained by the ERO.

## Questions

1. Do you agree with the proposed MOD-032-2 modifications to address the FERC Order 901 directives? Please reference the technical rationale and consideration of FERC directives. If you do not support the modifications made, please provide rationale and proposed language on how you would address the FERC Order 901 directives.

Yes

No

Comments:

1. Do you agree that the Transmission Owner (TO) is typically the appropriate responsible entity for collecting and providing data for DER where there is no associated registered DP between the DER connection point and the TO’s system? If not, what entity would be in a better position to provide that data and add justification?

Yes

No

Comments:

1. Do you agree with the proposed IRO-010-5 and TOP-003-8 modifications to address the FERC Order 901 directives? Please reference the technical rationale and consideration of FERC directives. If you do not support the modifications made, please provide rationale and proposed language on how you would address the FERC Order 901 directives.

Yes

No

Comments:

1. Do you agree with the proposed DER definition? Please refer to the technical rationale, which provides rationale behind the drafting team’s intent and previous definitions proposed. If you do not support the definition as proposed, please explain the changes that, if made, would result in your support.

Yes

No

Comments:

1. Do you agree that the modifications for the proposed reliability standards (MOD-032-2, IRO-010-5, and TOP-003-8) address the scope of the standard authorization request (SAR) in a cost-effective manner? If you do not agree, please provide alternatives that would address the SAR scope in a more cost-effective manner.

Yes

No

Comments:

1. Do you agree with the proposed ERO Approved Criteria for Acceptable Models document? If you do not agree, please provide alternative language and explain the rationale that, if made, would result in your support.

Yes

No

Comments:

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

Comments: