Unofficial Comment Form

Project 2023-02 Analysis and Mitigation of BES Inverter-Based Resource Performance Issues

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments ondraft two of **PRC-030-1 Unexpected Inverter-Based Resource Event Mitigation** by **8 p.m. Eastern, Wednesday, July 10, 2024.**  
**m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2023-02-Performance-of-IBRs.aspx). If you have questions, contact Standards Developer, [Josh Blume](mailto:josh.blume@nerc.net) (email), or at 404-446-2593.

## Background Information

Multiple NERC disturbance reports have identified the undesired performance of bulk power system (BPS)-connected inverter-based resources (IBRs) during grid faults, and have elaborated on the systemic and significant BPS reliability risks that this undesired performance can pose. Project 2023-02 addresses the reliability‐related need by requiring analysis and mitigation of unexpected or unwarranted protection and control operations from IBRs. This includes any types of protections and controls that result in abnormal performance issues within the plant, including abnormal performance resulting in anomalous behavior of active power output from the facility during events.

On October 19, 2023, FERC issued Order No. 901, which directed NERC to develop new or modify existing Reliability Standards that include new requirements for disturbance monitoring, data sharing, post-event performance validation, and correction of IBR performance. Project 2023-02 was one of three projects identified by NERC that must be completed and filed with FERC by November 4, 2024 to address Order No. 901 directives. At the December 2023 Standards Committee (SC) meeting, the SC approved a waiver allowing formal comment periods to be reduced from 45 days to as few as 25 calendar days, and final ballot periods to be reduced from 10 days to as few as 5 calendar days in order to help meet the FERC- directed deadline.

**Questions**

1. Does the entity believe there should be any proposed changes in the thresholds in Requirement R1?

Yes

No

Comments:

2. Do you believe there are alternatives or more cost-effective options to address the recommendations in the FERC Order? If so, please provide your recommendation and, if appropriate, technical, or procedural justification.

Yes

No

Comments:

3. Does the entity have any concerns regarding the 2023-02 Implementation Plan? If so, please provide your recommendation and, if appropriate, technical, or procedural justification.

Yes

No

Comments:

4. Provide any additional comments for the Drafting Team to consider, if desired.

Comments: