Unofficial Comment Form

Project 2025-03 Order No. 901 Operational Studies

**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 2025-03 Order No. 901 Operational Studies** by **8 p.m. Eastern, Wednesday, October 1, 2025.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project2025-03OrderNo901OperationalStudies.aspx). If you have questions, contact Senior Standards Developer, Jessica Harris (via email), or at 404-446-9663.

## Background Information

The proliferation of Inverter-Based Resources (IBRs) pose a significant reliability risk to the electrical grid. On October 19, 2023, the Federal Energy Regulatory Commission (FERC) issued Order No. 901 directing the development of a new or revised Reliability Standard to address reliability concerns related to IBRs at “all stages of interconnection, planning, and operations.”[[1]](#footnote-1) In January 2024, NERC filed the initial [Standards Development Work Plan](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/NERC%20Compliance%20Filing%20Order%20No%20901%20Work%20Plan_packaged%20-%20public%20label.pdf) to address the FERC Order No. 901 directives (hereafter referred to as the “Work Plan”). The Work Plan discusses how NERC will develop Reliability Standards within three tranches (Milestones 2, 3, and 4) to meet FERC’s filing deadlines. Milestone 4 of the Work Plan covers operations and Planning Assessments. This Standard Authorization Request addresses Milestone 4 – Group 2 of the Work Plan, related to planning studies.

This Standard Authorization Request was provided to the Reliability and Security Technical Committee (RSTC) during its June 2025 meeting for its review and comments. FERC Order No. 901 requires that a new or revised Reliability Standard must be filed by November 4, 2026.

## Questions

1. Do you agree with the proposed scope described in the Standard Authorization Request? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation or explanation.

[ ]  Yes

[ ]  No

Comments:

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

Comments:

1. Order No. 901, *Reliability Standards to Address Inverter-Based Resources*, 185 FERC ¶ 61,042 (2023) at P 25 [hereinafter Order No. 901]. [↑](#footnote-ref-1)