Unofficial Comment Form

Project 2023-01 EOP-004 IBR Event Reporting

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on draft two of Reliability Standard **EOP-004-5**  **–** **Event Reporting** by **8 p.m. Eastern, Wednesday, March 27, 2024.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2023-01-EOP-004-IBR-Event-Reporting.aspx). If you have questions, contact Senior Standards Developer, Chris Larson (via email), or at 404-446-9708.

## Background Information

## ​​​The Standard Authorization Request (SAR) proposes enhancements to EOP-004-4 (EOP-004) focused on ensuring timely reporting by industry to the Electric Reliability Organization (ERO) Enterprise through reporting of events involving inverter-based resources (IBRs). Currently, the standard has relatively large generator loss size thresholds and uses language more suitable for synchronous generation. The SAR proposes to enhance the standard by adding clarity and lowering the generator loss threshold to encompass the lessons from widespread IBR loss events that have occurred. The NERC Inverter-based Resource Performance Subcommittee (IRPS) presented the SAR to the Reliability and Security Technical Committee (RSTC) for comment in September 2022. After responding to the RSTC comments, the IRPS resubmitted the SAR, and the RSTC endorsed the SAR on December 6, 2022. The Standards Committee accepted the SAR on January 25, 2023.

## The proposed project will address the issue that reporting of generation loss events, per the current EOP-004, uses relatively large size thresholds more suitable for synchronous generation; however, NERC and the Regional Entities have analyzed multiple widespread solar PV loss events (some also involving other generation losses as well) across a large number of resources that did not meet the EOP-004 criteria, yet have highlighted systemic reliability risks posed by IBRs that should be reported by applicable entities. This project will modify the existing generation loss criteria so it is more suitable and appropriate for reporting IBR events and so it aligns with past large-scale disturbances analyzed by the ERO. Without these improvements, the ERO must lean on ad hoc reporting per the NERC Event Analysis Process, which is voluntary in nature and involves significantly longer reporting timelines. The EOP-004 standard should be aligned with this process from a reporting size criteria perspective. As reported in numerous ERO disturbance reports, access to data useful for event analysis and risk mitigation following large-scale disturbances has been challenging for IBRs. This has resulted in data unavailability and overwriting by affected facilities since the ERO Enterprise is unable to send requests for information in a timely manner (i.e., must wait for the brief report to be submitted by the associated Reliability Coordinator first). Improved reporting will enable quicker response to widespread IBR loss events and ultimately lead to improved performance of the generation fleet through more detailed analysis and coordination with affected entities, where applicable.

Please provide your responses to the questions listed below, along with any detailed comments.

## Questions

1. Do you agree with the language proposed in EOP-004-5 Attachment 1 as proposed, or with non-substantive changes? If you do not support EOP-004-5 Attachment 1 as proposed, please explain the changes that, if made, would result in your support.

[ ]  Yes

[ ]  No

Comments:

1. The Standard Drafting Team (SDT) proposes a two (2) year implementation plan for EOP-004-5. Do you agree with the proposed implementation plan? If you do not support the implementation plan as proposed, please explain the changes that, if made, would result in your support.

[ ]  Yes

[ ]  No

Comments:

1. The SDT believes the language of EOP-004-5 addresses the issues outlined in the SAR in a cost-effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical, or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments on the standard and technical rationale for the DT to consider, if desired.

Comments: