

Project 2020-01 Modifications to MOD-032-1 Standard Authorization Request

Summary of Comments | November 2020

Section 1: General Response and Resources

General Response

The Standard Authorization Request Drafting Team (SAR DT) appreciates the feedback and comments made by industry, and the team has and will continue to give them due consideration. The SAR as written by the SPIDERWG, specifically in the *Detailed Description* section shown below, provides specific items for the Project 2020-01 Standard Drafting Team (SDT) to “consider and address”. The SAR DT feels that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome that takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback.

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification² which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):

This SAR proposes to address the issues identified in the project scope above. Specifically, the following details should be considered and addressed by the drafting team:

Resources

- [Project 2020-01 Modifications to MOD-032-1](#)
- [MOD-032-1 SAR](#)
- [Industry Comments](#)
- [Reliability Guideline: DER Data Collection for Modeling in Transmission Planning Studies](#)

Section 2: Major Themes

Theme 1

Table 1 of MOD-032 Attachment 1 does not need to be updated because “Item 9” already allows the PC or TP the flexibility to request any other information necessary for modeling purposes which includes DER data.

Response

The SAR DT acknowledges the described concerns from industry in relation to whether adding additional references to aggregate DERs in the information listed in Table 1 of MOD-032 is necessary and those comments will be considered by the SDT in the development of any additions or modifications. The SAR DT feels that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback.

Theme 2

SAR is too prescriptive and proposed revisions are potentially over burdensome.

- Potential jurisdictional issues (not allowed to request, state requirements, etc.) with collecting this data since this is non-Bulk Electric System (BES) generation with references to retail scale DER.
- Entities that TP would rely on to provide data may not be NERC Functional Entities (e.g. small DP's that are not registered entities).
- PC/TP should be allowed to develop data specifications jointly with DP.
- DPs may not have the data, software, expertise, or forecasting ability.
- Should not require BES level modeling data for non-BES DER.
- Responsibility of BES modeling should not be placed on DPs who operate non-BES components.
- Unknown cost impact may not be minimal as stated.
- No technical justification to demonstrate a reliability gap exists with existing MOD-032.

Response

The SAR DT acknowledges the described concerns of the industry in relation to responsible entities, prescriptiveness, and potential technical justifications and will incorporate the comments as considerations for developing requirement language with an appropriate amount of flexibility. The SDT will strive to create language that is not too prescriptive for an entity, overly burdensome, or unreasonable to implement. In addition, the SAR DT feels there is technical justification supporting the SAR outlined in the *NERC Reliability Guideline: DER Data Collection for Modeling in Transmission Planning Studies*. The SAR DT feels that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback. This would include further investigation into the technical justifications.

Theme 3

MOD-032 language is too broad to ensure the responsible entity provides all necessary data without long iterative negotiations with individual entities, resulting in inadequate data and modeling delays. THEME 3 reads essentially as the inverse of THEME 1.

- This is particularly true for non-vertically integrated utilities.

- Needed to improve quality of system modeling and data exchange which is a major Theme contributing to major reliability events over time.
- Does not ensure that all entities will follow industry best practices and include adequate DER modeling data.
- Inconsistencies and gaps in aggregated DER modeling data requirements and reporting procedures will likely occur in absence of specifications and will negatively affect reliability tasks.
- “Item 9” interpretation by entities may or may not give the TP/PC the authority to request DER data. Discussions between entities can often transition into a question/debate about market rules, rather than relying on MOD-032.

Response

The SAR DT acknowledges the comments made by industry that additional references to aggregate DERs in the information listed in Table 1 of MOD-032 is necessary in order to aid in the timely collection of data and those comments will be considered by the SDT in the development of any additions or modifications. The SAR DT feels that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback.

Section 3: Minor Themes

Theme 4

Most comments mention no adequate justification to consider DER definition at this time. In addition, the DER term is not well understood and appropriate detail should be defined somewhere in NERC documents.

Response

Depending on the requirement language drafted, the SDT will consider whether to include DER as a defined term or if a generally accepted/working definition for DER will be used. As stated in the SAR, “in alignment with adding ‘DER’ to the Attachment 1 table regarding necessary data for modeling purposes, it may be needed (based on the discretion of the SDT) to add a definition for ‘Distributed Energy Resource (DER)’ to the NERC Glossary of Terms.” Existing available DER definitions and related terms (e.g. DER or aggregate DER) from the SPIDERWG, FERC Order 2222, and other pertinent resources will be considered by the SDT.

Theme 5a

A Reliability Guideline allows flexibility for the DP to work with the TP/PC and is a more efficient and effective method to address DER data requests. This and other SPIDERWG work products should be utilized to guide better approaches and methods to data collection and analysis.

Response

The SAR DT acknowledges the comments made in reference to utilization of NERC Reliability Guidelines in lieu of standard modifications at this time. The SAR DT feels that it is appropriate to consider

modifications to the standard at this time. There is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes into consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback. The SAR DT is aware of and has given consideration to the *NERC Reliability Guideline: DER Data Collection for Modeling in Transmission Planning Studies*.

Theme 5b

Wait for Reliability Guideline to be developed and practiced for a period before evaluating the proposed MOD-032 revisions in the SAR.

Response

The SAR DT acknowledges the comments made by industry in reference to utilization of NERC Reliability Guidelines in lieu of standard modifications at this time. The SAR DT feels that it is appropriate to consider modifications to the standard at this time and that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback. The SAR DT is aware of and has given consideration to the *NERC Reliability Guideline: DER Data Collection for Modeling in Transmission Planning Studies*.

Theme 6

SAR should give latitude to PC/TP to devise mechanism for collecting DER information needed for its area. Information needed and process required may vary by area/region and penetration levels.

Response

The SAR DT acknowledges and will incorporate the comments as considerations for developing requirement language with an appropriate amount of flexibility for PCs/TPs. The SAR DT feels that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback.

Theme 7

Most comments were supportive of change from LSE to DP.

- This change could be done as a part of five-year review process Project 2017-07 Standards Alignment with Registration.
- Need to conduct thorough analysis to ensure DP is the correct replacement for LSE.
- Quick resolution needed on replacement of LSE with DP. Potential gap with current data collection of DER. (Already approved under Project 2017-07 Standards Alignment with Registration)
- Removal of LSE is appropriate, but replacement with DP is inconsistent with FERC Order approving removal of LSE because it is low risk to the BES.
- Concern with DP being the responsible entity, when several entities are not registered as a DP.

Response

The SAR DT acknowledges the comments in relation to changes to the responsible entities and will incorporate the comments as considerations for developing requirement language. As outlined in SAR Project Scope Parts C and D, the SAR DT feels it is appropriate for the SDT to consider the change from LSE to DP, to include adding responsible entities, and further investigate any potential gaps or additional considerations that may be necessary. The SAR DT feels that there is enough flexibility in the SAR language to empower the SDT to develop a risk-based, balanced outcome which takes in to consideration the issues and concerns that are representative of multiple entities and regions with an appropriate amount of industry outreach and feedback.

Theme 8

Recommend scope of SAR be expanded to include potential changes to TPL-001. Data collection requirement in MOD-032 could become just an administrative item if there is not corresponding requirement in TPL-001 to use the data.

Response

While the SAR DT understands the working relationship between these two standards, SPIDERWG is currently evaluating the TPL Standard to see if any technical gaps exist. In order to ensure a timely resolution of items addressed in the current SAR version, the SAR DT will not seek to expand the SAR to include any revisions to TPL-001.

Theme 9

Single SAR and SDT should be formed to handle all DER related revisions at one time.

Response

The SPIDERWG prioritized this effort for DER revisions above other items. MOD-032 revisions will be pursued first in order to ensure a timely resolution of items addressed in the current SAR version.