Unofficial Comment Form

Project 2020-06 Verification of Models and Data for Generators

Inverter-based Resource-related Definitions

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **MOD-026-2** **–** **Inverter-Based Resource (IBR) related Glossary Terms by 8 p.m. Eastern, Monday, April 8, 2024.  
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2020_06-Verifications-of-Models-and-Data-for-Generators.aspx). If you have questions, contact Senior Standards Developer, [Chris Larson](mailto:chris.larson@nerc.net?subject=Project%202020-06%20Comment%20Period) (via email), or at 470-599-3851.

## Background

## The NERC IBR Performance Task Force (IRPTF) performed a comprehensive review of all NERC Reliability Standards to identify any potential gaps and/or improvements. The IRPTF discovered several issues as part of this effort and documented its findings and recommendations in the IRPTF Review of NERC Reliability Standards White Paper, which was approved in March 2020 by the Operating Committee and the Planning Committee (now part of the Reliability and Security Technical Committee (RSTC)). Among the findings noted in the white paper, the IRPTF identified issues with MOD-026-1 and MOD-027-1 that should be addressed by a project. The RSTC endorsed the standard authorization request (SAR) June 10, 2020.

## The Standards Committee accepted two revised SARs at its July 21, 2021 meeting. The scope of the project includes the potential to add, modify, or retire Glossary Terms for NERC Reliability Standards. The Project 2020-06 drafting team (DT) proposes two new terms as part of this formal comment and initial ballot period.

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

**Questions**

1. Do you support the definition for Inverter-Base Resource (IBR) as proposed, or with non-substantive changes? 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 support the definition for IBR Unit as proposed, or with non-substantive changes? 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. As discussed in the Technical Rationale, the proposed definitions would define the scope of equipment, but would not define the scope of IBR units subject to mandatory compliance with Reliability Standards. Each standard would define the applicable units subject to compliance with that standard. An example to include both BES and non-BES IBRs is as follows:

**Section 4. Applicability:**

**4.1 Functional Entities:** Generator Owner, Generator Operator

**4.1 Facilities:** (1) BES Inverter-Based Resources; and (2) Non-BES Inverter Based Resources (IBRs) that that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV.

Please provide any suggested revisions you feel would improve the readability of this example.

Comments:

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

Comments: