

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the <u>NERC Help Desk</u>. Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

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Requested information					
		nission System Planning Performance Requirements			
Date Submitted: 12/15/2021 (Revise		ed on June	22, 2022)		
SAR Requester					
	Zhu, MISO (NERC SPID				
Name: Bill C	luaintance, Duke Ener	rgy Pro	gress (NE	RC SPIDERWG Vice-Chair)	
(Revi	ised by Project 2022-0	02 SAR	Drafting ⁷	<u>[eam]</u>	
Organization: NERO	System Planning Imp	oacts fr	om DERs	Working Group (SPIDERWG)	
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SAR Type (Check as m	any as apply)				
New Standard			Im	minent Action/ Confidential Issue (SPM	
Revision to Exist	ing Standard		9	ection 10)	
Add, Modify or I	Retire a Glossary Term	n	U Va	riance development or revision	
☐ Withdraw/retire	Withdraw/retire an Existing Standard Other (Please specify)			her (Please specify)	
Justification for this p	Justification for this proposed standard development project (Check all that apply to help NERC				
prioritize developmen	ıt)				
Regulatory Initiation					
Emerging Risk (F	Reliability Issues Steer	ing	NERC Standing Committee Identified Enhanced Periodic Review Initiated		
Committee) Identified		Industry Stakeholder Identified			
Reliability Standard Development Plan					
Industry Need (What I	Bulk Electric System (I	BES) re	liability b	enefit does the proposed project provide?):	
Many distribution syst	tems connected both	directly	y and ind	rectly areas of to the North American BES are	
experiencing increasir	experiencing increasing penetrations of distributed energy resources (DERs). NERC Reliability Standard				
TPL-001-5.1 ¹ was developed under a paradigm of predominantly BPS-connected generation, particularly					
synchronous generation, when penetrations of DERs were significantly lower than current and future					
projections.					
Considering current trends, the NERC SPIDERWG undertook a review of the TPL-001 standard considering					
the potential impact of DERs. This review is captured in the following RSTC-approved white paper and					
serves as the technica	l justification for the r	revisior	ns sugges	ted in this SAR:	

¹ The scope of recent modifications to TPL-001-5 did not include considering the impacts of DER on <u>BESBPS</u> planning.



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SPIDERWG: Assessment of DER impacts on NERC Reliability Standard TPL-001 (<u>here</u>)

This SAR proposes to update TPL-001-5.1 to address some of the issues identified in the white paper.

TPL-001-5.1 does not currently require Planning Coordinators and Transmission Planners to complete Planning Assessments with adequate representation of the dynamic behavior of DERs. As the penetration of DERs increases, and based on the DER data and models available, Planning Assessments should include DERs that can potentially impact Transmission System performance assessment. NERC's "Lesson Learned: Single Phase Fault Precipitates Loss of Generation and Load", evaluating a 2019 frequency event in Southern England exacerbated by the unexpected reduction of 725 MW of IBR output and the unexpected loss of 350 MW of DER, highlights the critical importance of accurate Transmission System Planning Assessments.² In July 2020, a significant quantity of solar PV facilities across a large geographic area in Southern CA reduced about 1000 MW output due to a disturbance on the bulk power system³. Subsequent event analysis revealed that it was the consequence of momentary cessation and slow recovery of power. Standards enhancement has been one of the recommendations after the event analysis to ensure reliable operation of the bulk power system.

In general, the impact of DERs on the BES should be included in planning assessments if DER data and models are available. Any choice to exclude the consideration of the impact of DER on the BES should be supported by a technical rationale and/or justification.

Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):

The purpose of this SAR is to revise requirements to provide clarity or, in some cases, expand the scope of requirements when considering the performance of DERs to ensure the accuracy of Transmission System Planning Assessments.

Project Scope (Define the parameters of the proposed project):

As identified by SPIDERWG, <u>revision to</u> the following sections of TPL-001-5.1 should be <u>considered</u> revised to ensure the accuracy of Transmission System Planning Assessments:

- a. R2.1, R2.2, and R2.42, the use of phrase "System peak Load"
- b. R3.3.1.1 and R4.3.1.2, the "tripping of generators" in steady state and stability contingency analysis should include tripping of DER if data and models are available. The SDT can consider whether a threshold needs to be established.

https://www.nerc.com/pa/rrm/ea/Lessons%20Learned%20Document%20Library/LL20201001 Single Phase Fault Precipitates Loss of Generation and Load.pdf

https://www.nerc.com/pa/rrm/ea/Pages/July 2020 San Fernando Disturbance Report.aspx



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- c. R4.1.1 and 4.1.2, the stability performance criteria should be applicable to both synchronous and asynchronous generation, inclusive of DER.
- d. R4.3.2, the list of dynamic control devices should include DER so that the expected automatic operation of DER (e.g., DER tripping, dynamic voltage and frequency controls, momentary cessation, etc.) can be considered in stability analyses.
- d.e. Assuming that revisions to the MOD-032 standard ensure that DER model data is available, modification to the TPL-001 standard should give consideration to potential exclusions of explicit DER modeling based on technical rationale.

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 justification⁴ 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):

A detailed description of each Project Scope item is given below:

a. R2.1 and R2.2, the use of phrase "System peak Load"

With increased penetration of DER, the load that transmission system supplies is the net load (net load = gross load – DER output) as seen at the T-D interface, which might reach its peak during operating conditions that are not at the peak gross load hour. As such, there is a need for individual TPs to be required to document and define their peak load conditions (e.g., gross or net) in their assessments. The SDT should consider adding the terms "Gross Load" and "Net Load" to the NERC Glossary of Terms and updating the term "System peak Load" in the standard to "System peak net Load". In addition, a high gross load hour may be the most stressed load driven condition for contingencies that may trip large amounts of DER. High system peak gross load may be studied as additional scenarios as required by current standard under R2.1.3.

b. R3.3.1.1 and R4.3.1.2, the "tripping of generators" in steady state and stability contingency analysis should include tripping of DER if data is available. The SDT can consider whether a threshold needs to be established.

The terms "generators" in Sub-requirements 3.3.1.1 and 4.3.1.2 should be clarified. DERs that are explicitly modeled as generators should be tripped where simulations show bus voltages that are less than known or assumed minimum DER steady-state or ride-through voltage limits. It is also recommended to consider inclusion in the assessment any assumptions made in estimating DER bus voltage.

⁴ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.



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c. R4.1.1 and 4.1.2, the stability performance criteria should be applicable to both synchronous and asynchronous generation, inclusive of DER.

For example, the language referring to "pulls out of synchronism" is only relevant to synchronous generation and is not applicable to inverter-based generation (including inverter-based DER). However, large amounts of asynchronous DER tripping on low/high voltage/frequency conditions can also adversely affect BES performance and may pose a risk to system instability for conditions such as cascading, voltage instability, or uncontrolled islanding if not properly studied and identified ahead of real-time operations. It is recommended to expand the stability performance criteria to include both synchronous and asynchronous generation.

d. R4.3.2, the standard should recognize that the list of dynamic control devices should consider the expected automatic operation of DER (e.g., DER tripping, dynamic voltage and frequency controls, momentary cessation, etc.) in stability analyses. The SDT can consider adding asynchronous generator related devices like inverter, plant controller, etc.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Although the cost impact is unknown, costs to Planning Coordinators and Transmission Planners will increase as Transmission System Planning Assessments reflect additional dynamic components and controls. It is anticipated that this cost will vary depending on training, tools, scenario development, and other factors in each Planning Coordinators and Transmission Planners' area.

Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):

None. This SAR will primarily impact Transmission System Planning Assessments, not any specific BES facilities, although as individual IBRs continue to increase in size (e.g. 14MW wind turbines), there may be some impact in the near future.

To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):

Planning Coordinators and Transmission Planners, i.e. the applicable entities for this standard. Additionally, Distribution Providers, Generator Owners, and DER aggregators participating in markets- i.e. not an applicable entity to this standard, would be useful to include.



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Do you know of any consensus building activities⁵ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.

This SAR is the outcome of the following white paper that was developed by the NERC technical sub-group under the RSTC.

SPIDERWG: Assessment of DER impacts on NERC Reliability Standard TPL-001 (here)

Deliverables, and the key findings and recommendations contained within, were thoroughly reviewed and approved by the RSTC.

Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?

No

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.

Among all the issues identified in the NERC SPIDERWG white paper, the ones included in this SAR cannot be addressed by any alternatives. Standard language change will ensure DER impacts being considered appropriately. NERC SPIDERWG will prepare a Reliability Guideline to address the rest of the findings from their white paper.

Reli	abil	ity	Princi	pies

		Reliability Filliciples
		proposed standard development project support at least one of the following Reliability
Princ	iple	s (<u>Reliability Interface Principles</u>)? Please check all those that apply.
\boxtimes	1.	Interconnected bulk power systems shall be planned and operated in a coordinated manner
		to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
	2.	The frequency and voltage of interconnected bulk power systems shall be controlled within
Ш		defined limits through the balancing of real and reactive power supply and demand.
	3.	Information necessary for the planning and operation of interconnected bulk power systems
		shall be made available to those entities responsible for planning and operating the systems
		reliably.
	4.	Plans for emergency operation and system restoration of interconnected bulk power systems
		shall be developed, coordinated, maintained and implemented.
	5.	Facilities for communication, monitoring and control shall be provided, used and maintained
		for the reliability of interconnected bulk power systems.
	6.	Personnel responsible for planning and operating interconnected bulk power systems shall be
		trained, qualified, and have the responsibility and authority to implement actions.
	7.	The security of the interconnected bulk power systems shall be assessed, monitored and
		maintained on a wide area basis.
	8.	Bulk power systems shall be protected from malicious physical or cyber attacks.

⁵ Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.



Market Interface Principles			
Does the proposed standard development project comply with all of the following	Enter		
Market Interface Principles?	(yes/no)		
 A reliability standard shall not give any market participant an unfair competitive advantage. 	Yes		
A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes		
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes		
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes		

Identified Existing or Potential Regional or Interconnection Variances			
Region(s)/	Explanation		
Interconnection			
None	None		

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SAR Status Tracking (Check off as appropriate).					
 Draft SAR reviewed by NERC Staff Draft SAR presented to SC for acceptance DRAFT SAR approved for posting by the SC 	Final SAR endorsed by the SC SAR assigned a Standards Project by NERC SAR denied or proposed as Guidance document				

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk



4 February 25, 2020	Standards Information Staff	Updated template footer
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