**Unofficial Comment Form**  
**Project 2018-04 Modifications to PRC-024-2**

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the Project 2018-04 Modifications to PRC-024-2 by 8 p.m. Eastern, Monday, November 4, 2019.

See the project page or contact Standards Developer, Mat Bunch (via email) or at (404) 446-9785 for more information or assistance.

**Background Information**
On November 27, 2018, the NERC Operating Committee (OC) and Planning Committee (PC) submitted a Standard Authorization Request (SAR) prepared by the Inverter-Based Resource Performance Task Force (IRPTF), which reports to the OC and PC.

Based off the analyses of the Blue Cut Fire and Canyon 2 Fire disturbances in southern California along with the development of the PRC-024-2 Gaps Whitepaper, the IRPTF identified potential modifications to PRC-024-2 to ensure that inverter-based generator owners, operators, developers, and equipment manufacturers understand the intent of the standard in order for their plants to respond to grid disturbances in a manner that contributes to the reliable operation of the BPS. In order to address the issues in the SAR, the standard drafting team developed the proposed modifications in PRC-024-3.

**Questions**

1. Based on industry feedback, the SDT removed the Transmission Owner (TO) from the Applicability (Functional Entities) of PRC-024-3. Do you agree with this change? If not, please provide the basis for your disagreement and a specific instance where not including the TO would present a risk to reliability.
   - Yes
   - No
   Comments:

2. Based on industry feedback, the SDT modified the Applicability (Facilities) to clarify both the types of ‘protection’ applicable, if activated, and the specific equipment the ‘protection’ is applied on. Do you agree with these changes? If not, please provide the basis for your disagreement and an alternate solution.
   - Yes
   - No
   Comments:

3. To address Scope Item ‘f’ from the approved SAR, the SDT added an exemption to the Applicability (Facilities) to clarify that all auxiliary equipment and associated protection(s) within the generating
Facility are not applicable to the standard. Do you agree with the ‘Exemption’? If not, please provide the basis for your disagreement and an alternate solution.

☐ Yes
☐ No

Comments:

4. Based on industry feedback, the SDT replaced the 0.1 second ‘Minimum Time (Sec)’ value in the frequency tables with “Instantaneous” and provided additional clarity via Footnote #6 regarding frequency calculation/measurement. Do you agree with this change? If not, please provide the basis for your disagreement and an alternate solution.

☐ Yes
☐ No

Comments:

Please include the NPCC Region’s underfrequency no-trip boundary in the Supplemental Material section of the standard – Attachment 1. The NPCC Region’s under-frequency boundary is more stringent than the Eastern Interconnection Boundary.

The low voltage duration, voltage (pu) < 0.45 minimum (sec) 0.15 appears to be insufficient. Clearing times for High Voltage circuits can often exceed 0.15 seconds. Therefore, the exposure to generators tripping during normally cleared faults is higher than optimal. Please consider increasing the Low Voltage Duration No Trip Zone-boundary for the <0.45 pu voltage threshold.

Please consider adding additional details of restrictions on active and reactive power cessations during underfrequency or overfrequency conditions. As written, the standard could allow momentary cessation of active (real) current inside the frequency envelope of Attachment 1, as long as reactive current is provided. Cessation of active (real) current for frequencies inside the frequency envelope could compromise the effectiveness of the UFLS program.

5. Based on industry feedback, the SDT revised the Implementation Plan to provide twenty-four months for applicable entities to evaluate settings, make changes for applicable equipment, and purchase necessary equipment, if necessary. Do you agree with the revised Implementation Plan? If not, please provide the basis for your disagreement and an alternate proposal.

☐ Yes
☐ No

Comments:

6. Do you agree that the proposed modifications provide a cost-effective means of addressing issues identified in the SAR? If not, please provide an alternative, more cost-effective manner in which to achieve at least an equivalent level of reliability.

☐ Yes
☐ No

Comments: