

**From:** [Ruida Shu](#)  
**To:** [rsballot](#)  
**Cc:** [rscmembers](#)  
**Subject:** NERC Project 2021-01 Modifications to MOD-025 and PRC-019 Initial Ballot Recommendation  
**Date:** Monday, November 14, 2022 11:16:22 AM

---

## NPCC Members and Entities of the NERC Registered Ballot Body:

The NPCC Regional Standards Committee (RSC) has followed the drafting activities of the Project 2021-01 Modifications to MOD-025 and PRC-019 drafting team. Currently, there is a 45-day comment period open through 8 p.m. EST, Monday, November 14, 2022, for the subject project. The project proposes revisions to the following standards and has an associated Implementation Plan.

-MOD-025-3 – Verification of Real and Reactive Power Capability for BES Facilities --

Ballot Recommendation: Abstain

-MOD-025-3 – Implementation Plan

-PRC-019-3 – Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection -- Ballot Recommendation: Abstain

-PRC-019-3 – Implementation Plan

The Power Plant Modelling and Verification Task Force (PPMVTF) has recommended revisions to MOD-025-2 to address issues regarding verification and data reporting of generator active and reactive power capability. As stated in the Standard Authorization Request (SAR), the standard has rarely produced data that is suitable for planning models (i.e., the stated purpose of the standard). The current MOD-025-2 verification testing activities require significant time, expertise, and coordination; however, they do not result in data that should be used by planners for modeling purposes. The revised standard will retain testing activities that are useful and focus on more effective means of collecting useful data for planning models.

PRC-019-2 addresses the reliability issue of miscoordination between generator capability, control systems, and protection functions. PRC-019-2 was developed with a bias toward synchronous generation and does not sufficiently outline the requirements for all generation resource types. The revised standard will address several issues identified by the System Protection and Control Subcommittee (SPCS) and will all types of generation resources.

NPCC as the Regional Entity will be casting an “**Abstention**” on the posted materials.

Thanks,

**Ruida Shu**

*Manager, Reliability Standards*



**Northeast Power Coordinating Council, Inc.**

1040 Avenue of the Americas - 10th Floor

New York, New York 10018

**O:** (917) 934-7976 • **C:** (917) 232-5140

[rshu@npcc.org](mailto:rshu@npcc.org) • [www.npcc.org](http://www.npcc.org)