

Unofficial Comment Form

Project 2020-01 Modifications to MOD-032-1

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on **Project 2020-01 Modifications to MOD-032-1** by **8 p.m. Eastern, April 24, 2020**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Chris Larson](#) (via email), or at 404-446-9708.

Background Information

With the penetration of distributed energy resources (DER) continually increasing across the continent, it is imperative that the risk DER pose to the reliability of the Bulk Power System be minimized by improving the modeling of aggregate DER in planning studies. The SPIDERWG reviewed MOD-032-1 Data for Power System Modeling and Analysis and developed a Standard Authorization Request (SAR) requesting modifications be made to the standard to address the collecting and reporting of aggregate data for DER. This data is necessary to support the development of accurate interconnection-wide base cases for the planning horizon.

The SPIDERWG presented its SAR to the Planning Committee (PC) during its June 2019 meeting, and the PC appointed reviewers. Based on the feedback from the PC reviewers, the SPIDERWG revised the SAR and presented it to the PC at its December 2019 meeting. The PC endorsed the SAR, and recommended it move forward to the NERC Standards Committee. The Standards Committee accepted the SAR at its March 2020 meeting.

Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

- Yes
 No

Comments:

We suggest that Scope element 'c' be given priority and that the remaining Scope elements to be done in a separate project phase as part of this SAR. It is necessary to include distributed energy resources (DER) data (includes data for resource capability, short circuit, and dynamic performance) and reporting requirements within the MOD-032-2 standard. We support the replacement of the Load Serving Entity (LSE) function with the Distribution Provider (DP) function and adding a general line item for DER in the steady-state, dynamics, and short circuit sections of the table. This would provide Planning Coordinators (PC) and Transmission Planners (TP) flexibility in the collection of DER data. We recommend that the SPIDER WG continue developing recommended practices and reliability guidelines related to data collection for DER modeling to support the PCs and TPs in the development of their data requirements and reporting procedures, per MOD-032. It is noteworthy that the NERC Reliability Guideline, 'DER Data Collection for Modeling in Transmission Planning Studies' is dependent on the change of LSE to DP in MOD-032-1. By delaying the change LSE to DP, this NERC Guideline document would be negatively impacted.

Prioritization of the element in the proposed scope to define DER should be a lower priority action. This should not delay the change in functional applicability.

2. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments: