Unofficial Comment Form
Project 2020-02 Transmission-connected Resources
Standard Authorization Request

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System to submit comments on the Project 2020-02 Transmission-connected Resources Standard Authorization Request by 8 p.m. Eastern, Wednesday, April 29, 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
The potential risk of increasing amounts of reactive power being supplied by nonsynchronous sources was identified in NERC’s 2017 Long-term Reliability Assessment. In response to the concern, the Planning Committee (PC) assigned the System Analysis and Modeling Subcommittee (SAMS) to study the issue. The SAMS developed the Applicability of Transmission-Connected Reactive Devices white paper, which was approved by the PC at its December 10-11, 2019 meeting. The PC Executive Committee reviewed the draft SAR from SAMS at its January meeting and subsequently approved the SAR by email vote ending on February 11, 2020. The SAR concerning Transmission-Connected Resources (TCR) aims to modify NERC Reliability Standards MOD-025, MOD-026, MOD-027, PRC-019 and PRC-024 to comprehensively include all types of dynamic reactive resources (including static var systems and FACTS) and DC transmission systems used to provide Essential Reliability Services (ERS) in the Bulk Electric System (BES).

Dynamic reactive resources used to provide ERS in the BES include generation resources (rotating machine and inverter-based) as well as transmission connected dynamic reactive resources (power-electronics based). Existing Reliability Standards for verifying the capability, modeling and performance of dynamic reactive resources are only applicable to Facilities comprising generation resources. Augmenting the applicability of these standards to include (nongeneration) transmission-connected reactive resources, both rotating machine (i.e. synchronous condenser) and power-electronics based, will enhance the BES reliability by ensuring that the capability, models and performance are verified and validated for all varieties of dynamic reactive resources utilized in providing ERS in the BES.
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:
Please consider revising the proposed scope to only include the transmission-connected dynamic reactive resources that are referenced in the SAMs white paper. This suggested revision would align with the detailed description of the SAR.

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

Comments:
The SAR drafting team should consider an implementation plan specifically for BES dynamic reactive resources initial MOD/PRC testing and reporting.