

Unofficial Comment Form

Project 2021-01 Modifications to MOD-025 and PRC-019

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on **Project 2021-01 Modifications to MOD-025 and PRC-019** by **8 p.m. Eastern, Monday, November 14, 2022**.

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

This project addresses issues identified in three Standard Authorization Requests (SARs).

The Power Plant Modelling and Verification Task Force developed a SAR to revise MOD-025-2 to address issues regarding verification and data reporting of generator active and reactive power capability. The SAR aims to retain testing activities that are useful and focus on more effective means of collecting useful data for planning models. The Reliability, Security, and Technology Committee endorsed the SAR on October 19, 2020. The Standards Committee (SC) later accepted the SAR on January 20, 2021.

The System Protection and Control Subcommittee drafted a SAR to address a number of issues identified and revise the standard to be inclusive of all types of generation resources. Currently, PRC-019-2 addresses the reliability issue of miscoordination between generator capability, control systems, and protection functions. However, PRC-019-2 was developed with a bias toward synchronous generation and does not sufficiently outline the requirements for all generation resource types. The NERC Planning Committee (PC) endorsed the SAR on March 4, 2020. The SC later accepted the SAR on January 20, 2021.

The System Analysis and Modeling Subcommittee developed the *Applicability of Transmission-Connected Reactive Devices* white paper and an associated SAR, in response to the potential risk of increasing amounts of reactive power being supplied by nonsynchronous sources. The PC endorsed the SAR on February 11, 2020. The SC later accepted the SAR on March 18, 2020.

To address the issues outlined in the three SARs, the SC appointed a single SAR drafting team (DT) on July 21, 2021. The SAR DT met August – October 2021 to review and revise the SARs. The scope of the Transmission-Connected Reactive Devices SAR was integrated into the MOD-025 and PRC-019 SARs. On December 15, 2021, the SC appointed the SAR DT as the standard drafting team (SDT) and authorized revisions to MOD-025-2 and PRC-019-02.

Please provide your responses to the questions listed below, along with any detailed comments.

Questions

1. Do you agree the language proposed in MOD-025-3 Requirement R1? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

2. Do you agree the language proposed in MOD-025-3 Requirement R2? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

3. Do you agree the language proposed in MOD-025-3 Requirement R3? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

4. Do you agree the language proposed in MOD-025-3 Requirement R4? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

5. Do you agree the language proposed in MOD-025-3 Attachments 1, 2, and 3? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

6. The SDT believes the language of MOD-025-3 addresses the issues outlined in the two SARs in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

7. The SDT proposes a 1-year implementation plan for MOD-025-3 Requirements R3 and R4, with an additional 2 years (3 years total) for compliance with Requirements R1 and R2. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

Yes
 No

Comments:

8. Provide any additional comments on MOD-025-3 and technical rationale document for the standard drafting team to consider, if desired.

Comments:

NPCC Regional Standards Committee (RSC) supports the drafting team proposal on the project.

9. Do you agree the language proposed in PRC-019-3 Requirement R1? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

10. Do you agree the language proposed in PRC-019-3 Requirement R2? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

11. Do you agree the language proposed in PRC-019-3 Attachment 1? If you do not agree, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

12. The SDT believes the language of PRC-019-3 addresses the issues outlined in the two SARs in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Yes
 No

Comments:

13. The SDT proposes a 1-year implementation plan for PRC-019-3 Requirement R2. For Requirement R1 with reoccurring periodicity for existing Facilities, the Implementation Plan proposes a six year reoccurring periodicity from the date of previous coordination date of PRC-019-2 R1. Would these proposed timeframes give enough time to put into place process, procedures or technology to meet the proposed language? If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period.

Yes

No

Comments:

14. Provide any additional comments on PRC-019-3 and technical rationale document for the standard drafting team to consider, if desired.

Comments:

NPCC Regional Standards Committee (RSC) supports the drafting team proposal on the project.