

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 agree that Distribution Provider needs to replace Load Serving Entity in the applicability section of MOD-032-1, but believe that change could be processed more efficiently via Project 2017-07 Standards Alignment with Registration.

We don't believe that the table in Attachment 1 of MOD-032-1 needs to be updated, since the table already allows for "[o]ther information requested by the Planning Coordinator or Transmission Planner necessary for modeling purposes. [BA, GO, LSE, TO, TSP]." This language allows flexibility for additional items to be requested to account for changing technology, regional variances, etc., including, as recognized in the DER Data Collection for Modeling in Transmission Planning Studies Reliability Guideline currently posted for comment ("DER Guideline"), "aggregate DER data necessary for modeling purposes." We note that adding DER information to the data requirements in MOD-032-1 could become a mere administrative exercise, in the absence of a corresponding obligation in TPL-001-4 for the Planning Coordinator and/or Transmission Planner to use the data. However, the latter obligation already exists as well, since TPL-001-4 R1.1.6 already requires the models to include "[r]esources (supply or demand side) required for Load."

This SAR is thus not needed and should be retired.

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

Comments: We believe a more effective and efficient method to address the emerging risk of DER penetration is through Implementation Guidance such as the DER Guideline that the SPIDERWG has proposed, which can inform the industry how significant levels of DER penetration can be integrated into their existing compliance efforts for MOD-032-1 and TPL-001-4. Such an approach would allow for this emerging technology and risk to be addressed without imposing mandates on areas of the grid that may not see significant DER penetration for many years.

We don't believe that a new working definition for DER is required at this time. The DER Report written and approved in 2017 establishes a reasonable working definition. Given that we do not believe DERs need to be specifically mentioned in MOD-032, and that the term does not appear to be used in any existing reliability standards, we don't see any need for including that definition in the NERC Glossary.