UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Reliability Standards to Address Inverter-Based Resources	))	Docket No. RM22-12-000

REPLY COMMENTS OF THE EDISON ELECTRIC INSTITUTE, THE AMERICAN PUBLIC POWER ASSOCIATION, THE LARGE PUBLIC POWER COUNCIL, THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION, AND TRANSMISSION ACCESS POLICY STUDY GROUP

The Edison Electric Institute ("EEI"), the American Public Power Association ("APPA"), the Large Public Power Council ("LPPC"), the National Rural Electric Cooperative Association ("NRECA"), and Transmission Access Policy Study Group ("TAPS") (collectively, "the Trade Associations")[1] submit these reply comments in response to the initial comments filed by the North American Electric Reliability Corporation ("NERC") on the Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission ("FERC or "the Commission") in this docket on November 18, 2022 ("the NOPR"). The Trade Associations specifically address NERC's request for flexibility in responding to proposed requirements of Distribution Providers and Transmission Owners to collect data and verify modeling for inverter-based resources ("IBRs") connected to the distribution system ("IBR-DERs").

At pages 30-34 of its initial comments ("Special Considerations for IBR-DER"), NERC underscores a concern articulated by the Trade Associations in our initial comments regarding the ability of Distribution Providers and Transmission Owners to obtain and validate IBR-DER specific modeling data. Sensibly, NERC asks FERC for "flexibility to determine the appropriate requirements for registered entities interfacing with aggregate IBR-DER."[2] NERC further

[1] The Trade Associations submitted joint initial comments in this docket on February 6, 2023.

[2] NERC Comments at 32.

suggests that "in lieu of requirements for an entity to provide a validated model, one approach may be to require coordination among the Transmission Owner, Distribution Provider, Transmission Planner, or Planning Coordinator to work collaboratively with state regulators to identify, implement, and perform an effective model validation approach for aggregate DER."[3]

The Trade Associations fully support NERC's request for flexibility in determining the appropriate requirements for registered entities in the effort to collect and model IBR-DER data. As the Trade Associations pointed out in our initial comments, the challenges are considerable. Any information regarding the technical specifications and operating parameters of IBR-DERs would be provided to Distribution Providers and Transmission Owners, if at all, during the interconnection process, and these registered entities may not have the contractual right to add additional requirements unilaterally and retroactively.[4] Further, for behind-the-meter ("BTM") facilities connected to distribution systems, Trade Association members report that there is often no contractual requirement for technical specifications and operating parameters to be provided by the IBR owners. BTM interconnection agreements typically require that, prior to the interconnection, the installation is certified to meet the specifications contained in the interconnection application, and that the IBR owner has equipped the IBR with sufficient net metering equipment to the extent that the IBR owner seeks to net meter. Under these agreements, there are no obligations for the IBR owner to provide historical performance data, real-time data or modeling data. Indeed, as also reported by Trade Association members, Distribution Providers in many cases may not even know when IBR-DERs are installed or modified in any way that would change established operating parameters, including changes in output, voltage support,

[3] *Id.*

[4] Trade Associations Comments at 10.

and system protection capabilities. For example, some solar installations, whether commercial, industrial, or homeowners installing on rooftops, do so without taking advantage of net metering or otherwise complying with their distribution utility's interconnection requirements. Further, where customers take advantage of net metering, the metering devices are generally not production meters, meaning they do not capture data relevant to the operating characteristics of the DERs. Nor are Trade Association members confident that they understand at this time the parameters defining what data is to be collected, and how to provide the modeling verification the Commission contemplates. While larger Distribution Providers may already have dedicated staff to administer interconnection agreements, as well as power quality devices to monitor voltage and harmonics, these resources will be challenged in seeking to administer every IBR-DER located on the Distribution Providers' systems. Smaller Distribution Providers very likely will have more limited resources and staff to perform these tasks. Further, these challenges would be magnified for Distribution Providers in rural areas where IBR-DER would be spread out over a large, dispersed footprint.

For these reasons, it is exceedingly difficult for Distribution Providers to be able to represent at this juncture that they will be able to collect useful data, much less validate models of IBR-DER operating parameters.[5] At page 33 of its comments, underscoring the point, NERC observes that "DER aggregators may be sources of modeling data and information; however, it is not clear that they would be able to provide all required parameters or whether they could separate generation from load."

With this in mind, the Trade Associations are doubtful about the workability of NERC's suggestion that "in lieu of requirements for an entity to provide a validated model, one approach

[5] *See* Comments of Arizona Public Service Company in this docket, at pp. 4-6, on this point.

may be to require coordination among the Transmission Owner, Distribution Provider, Transmission Planner, or Planning Coordinator to work collaboratively with state regulators to identify, implement, and perform an effective model validation approach for aggregate DER."[6] In light of the challenges discussed above, it would only be conjecture at this point that such collaboration would produce useful data and the basis for model verification that the Commission contemplates.

For these reasons, the Trade Associations reiterate their request that the Commission refrain from issuing a directive calling for Transmission Owners and Distribution Providers to monitor and model IBR-DER data that they cannot reasonably obtain. In the alternative, we ask that the Commission limit the obligations to be shouldered by Distribution Providers and Transmission Owners to what is feasible. We further support NERC's request that it be given the flexibility to determine appropriate requirements for registered entities interfacing with IBR-DER, to the extent that request recognizes practical limitations on what is feasible.

Respectfully submitted,

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[6] NERC Comments at 32.

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March 6, 2023