

PRR 151 - Establish Minimum Interconnection Standards for Large IBRs based on IEEE 2800-2022

Initial Review of Stakeholder Comments Received after 45 day
Posting Period Ending April 27, 2023

PRR 151 Stakeholder Comments

- Comprehensive & constructive responses from Nine Stakeholders

[https://www.nysrc.org/PRR Comments Received.html](https://www.nysrc.org/PRR%20Comments%20Received.html)

- NYISO
- Orsted
- ACE-NY
- Hydro-Quebec
- IPPNY
- National Grid
- NY-BEST
- LIPA/PSEG-LI
- VESTAS

PRR 151 Stakeholder Comments

General Comments

1. Recognition of need for reliability (2)
2. Stakeholder compliance ability/Need for surveys (3)
3. Material change concern (1)
4. Retroactive application/grandfathering concern (2)
5. Language clarifications (16)
6. Jurisdictional concerns (Federal NEPA/BOEM) (1)

Procedural Comments

1. Application limited to new IBR projects in I/C Process (2)
2. Stakeholder compliance obligations (NYISO, TO, IBR Owner) (7)
3. Compliance exception process (2)
4. Implementation Schedule (5)
5. Cost & scope of studies (2)
6. NYSRC/Stakeholder collaboration (2)
7. IEEE 2800's 200 "decision points" (1)
8. Impact of IEEE 2800.2 (1)
9. Delay implementation to coordinate with FERC initiatives & NERC IBR Standards (1)

Technical Comments

1. Modeling - fundamental frequency & EMT (NYISO to IBR Owner, IBR Owner to NYISO) (3)
2. Clarification of technical requirements (26)
3. Scope of adoption of most/some IEEE 2800 requirements (1)
4. Integration with IBR projects subject to IEEE 1547 (1)
5. Design Evaluation requirement (1)

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General Comments	NYISO	NY-BEST	IPPNY	ACE NY	ORSTED	NGRID	HQ	PSEG-LI	VESTAS	TOTAL
1. Recognition of need for reliability	1		1							2
2. Stakeholder compliance ability/Need for surveys	1	1		1						3
3. Material change concern		1								1
4. Retroactive application/grandfathering concern			1	1						2
5. Language clarifications	10							6		16
6. Jurisdictional concerns (Federal NEPA/BOEM)					1					1
Procedural Comments										
1. Application limited to new IBR projects in I/C Process	1		1							2
2. Stakeholder compliance obligations (NYISO, TO, IBR Owner)	1		1	1	1	1	1	1		7
3. Compliance exception process	1				1					2
→ 4. Implementation Schedule	3					1		1		5
5. Cost & scope of studies				2						2
6. NYSRC/Stakeholder collaboration			1	1						2
7. IEEE 2800's 200 "decision points"	1									1
8. Impact of IEEE 2800.2				1						1
9. Delay implementation to coordinate with FERC initiatives & NERC IBR Standards				1						1
Technical Comments										
→ 1. Modeling - fundamental frequency & EMT (NYISO to IBR Owner, IBR Owner to NYISO)	1				1			1		3
→ 2. Clarification of technical requirements	8			12	5				1	26
→ 3. Scope of adoption of most/some IEEE 2800 requirements	1									1
→ 4. Integration with IBR projects subject to IEEE 1547	1									1
→ 5. Design Evaluation requirement				1						1
	30	2	5	21	9	2	1	9	1	80

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Next Steps

- Analysis of comments
- Stakeholder outreach
- Develop detailed responses
- Consideration of PRR 151 revision based on comments received
- EC decision on reposting for further comments

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Proposed Road Map

