

**From:** "Eisenhuth, Robert (Tran Function)" <Robert.Eisenhuth@pseg.com>  
**Subject:** FW: Announcement of the posting of Potential Reliability Rules #151 for stakeholder comment for 45 days - LIPA / PSEG-LI Comments  
**Date:** April 27, 2023 at 6:06:12 PM EDT  
**To:** "herb.schrayshuen@poweradvisorsllc.com" <herb.schrayshuen@poweradvisorsllc.com>  
**Cc:** "Culpepper, Nicholas (Tran Function)" <Nicholas.Culpepper@pseg.com>, "Dreich, Dylan (Tran Function)" <Dylan.Dreich@pseg.com>, "Philip, Anie (Tran Function)" <Anie.Philip@pseg.com>, "Dahl, Curt (Tran Function)" <Curt.Dahl@pseg.com>, "Iqbal, Iram (Tran Function)" <Iram.Iqbal@pseg.com>, "Ibraheem, Muhammad (Tran Function)" <Muhammad.Ibraheem2@PSEG.COM>, "Ye, Lijia (Tran Function)" <Lijia.Ye@pseg.com>, Roger Clayton <roger.clayton@electricpowerresources.com>

Mr. Schrayshuen –

After review of the draft PRR #151 – Large Inverter Based Resources (IBR) Proposed Reliability Rule, we (PSEG Long Island on behalf of LIPA) can offer the following comments, questions and/or observations for consideration.

Several of the requirements might benefit from some clarity in the verbiage. Suggested edits for consideration are shown in RED text below.

R1. The NYISO shall prepare and maintain procedures for Large IBR Generating Facility interconnection studies based on uniform technical minimum requirements for interconnection, capability and performance of IBRs interconnecting with Transmission Systems, **that reflect the IEEE Standard 2800-2022 provision set forth below** as follows:

R2. The NYISO shall develop procedures **that require** ~~for ensuring~~ each Transmission Owner's IBR interconnection requirements are coordinated with requirements R1.1, R1.2 and R1.3.

Question: Should there be a requirement that requires each Transmission Owner to develop and maintain “local IBR interconnection requirements”?

R3. The NYISO shall develop procedures for ensuring each Large IBR Generating Facility Owner's compliance with **the IEEE Standard 2800-2022 provisions** ~~requirements~~ **itemized in** R1.1, R1.2 and R1.3.

R4. The NYISO shall annually submit a technical report documenting the assumptions, models and methodology of Large IBR Generating Facility

interconnection studies in accordance with requirements R1.1, R1.2, R1.3, R2 and R3.

Suggested re-wording:

R4. The NYISO shall annually submit a technical report documenting the assumptions, models and methodology **utilized with** of Large IBR Generating Facility interconnection studies **to demonstrate adherence** with requirements R1.1, R1.2, R1.3, R2 and R3.

R5. Each Transmission Owner shall provide their local IBR interconnection requirements to the NYISO.

Question: Should there be a requirement that requires each Transmission Owner to develop and maintain “local IBR interconnection requirements”?

R6. Each Large IBR Generating Facility Owner shall provide all applicable IBR models, data bases, model validation methods and performance criteria per requirements R1.1, R1.2 and R1.3.

Question: The Large IBR Generating Facility Owner shall provide all applicable IBR models, data bases, model validation methods and performance criteria per requirements R1.1, R1.2 and R1.3. to which entity or entities?

For example.....provide to the NYISO?; provide to the NYISO and the applicable Transmission Owner(s)?

Perhaps the requirement should clearly spell this out.

## 2. Levels of Non-Compliance

### 2.1 Measure 1:

Level 4: The NYISO failed to comply with one or more of the requirements R1.1, R1.2 and R1.3.

Comment: We observe that R1.1, R1.2 and R1.3 are not really “requirements”, but rather provision of IEEE Standard 2800-2022 that must be considered or documented within the Large IBR Generating Facility interconnection studies.

Suggestions for possible re-wording:

- “The NYISO failed to comply with R1.”

- “The NYISO procedures for Large IBR Generating Facility interconnection studies failed to reflect one or more of the IEEE Standard 2800-2022 provisions set forth in requirements R1.1, R1.2 and R1.3”

Observation on the proposed implementation plan:

To provide clarity to stakeholders, the proposed implementation plan in PRR-151 Section 9 should be revised to reflect the latest information from the NYSRC PRR-151 clarification document.

PRR-151 Requirements #2 and #5 may require Transmission Owners to update their local IBR interconnection requirements and documentation.

Such documentation may have to be presented to NYISO stakeholder committees (such as TPAS/ESPWG) prior to formal revision.

As stated in the clarification document, an implementation timeframe “Within six months following NYSRC Executive Committee approval of the final Reliability Rule but no later than the notice of CY2024 start date” would appear to give Transmission Owners time and flexibility to address Reqs 2 and 5.

The mention of specific NYISO interconnection process “class years” within the implementation plan should be coordinated with the NYISO, considering potential near term / future revisions to the interconnection process.

Finally, and we assume that this would be part of the normal process.....any additional clarity or specificity from the NYSRC PRR-151 clarification document should be reflected in a revised PRR-151 and re-submitted for stakeholder review.

Thank you,  
Bob