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Via email

December 21, 2023

Mr. Herb Schrayshuen, Secretary  
Reliability Rules Subcommittee/Reliability Compliance Monitoring Subcommittee  
New York State Reliability Council, L.L.C. (NYSRC)

[herb@poweradvisorsllc.com](mailto:herb@poweradvisorsllc.com)

**RE: Comments on Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1-11)**

Dear Mr. Schrayshuen,

AES Clean Energy, LLC (“AES”) appreciates the opportunity to provide comments on the final draft of the reliability rule PRR-151 based on IEEE 2800-2022. In New York, in order to meet the goals of the Climate Protection and Community Protection Act (CLCPA), many renewable Inverter Based Resources (IBRs) are being deployed and it is imperative that we ensure these resources operate reliably on the grid. AES provides several comments and suggestions to improve the implementation of PRR 151 and to ensure the reliability of the grid as these IBR renewables continue and begin operations. AES also supports ACE NY’s comments to the NYSRC on the final draft of PRR 151.

AES has spent more than two decades building projects in New York as one of the state’s leading developers. AES’ development pipeline in New York includes more than 2.4 GW of clean energy projects including utility-scale solar, wind, community solar, and energy storage. AES owns and operates one of the largest renewable energy portfolios in New York with 62 projects representing more than 850 MW of energy resources including Valcour Wind, a portfolio of 612 MW of operating wind projects.

**I. AES Suggestions**

**A. Attestation requirements**

As the new rule eliminates a thorough review of developer/owner attestations and methods to meet the requirements of PRR 151, AES is concerned that the standard will be inconsistently applied and create difficulty in evaluating compliance. The developers would be increasing their legal risk without a mechanism for feedback. Without proper oversight, the rule would not increase reliability.

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Thus, AES suggests the following changes in 7. Section B - Requirements:

1. Change the language in R1.1.: “~~Attest~~ **Will design** ~~that their~~ **its** IBR plant ~~will be designed~~ to be in compliance with the mandatory requirements of IEEE 2800-2022, as amended by "NYSRC Procedure for Application of IEEE 2800-2022 Standard for the New York Control Area””
2. Change the language in R1.2.: “~~Attest~~ **Provide** ~~that the best and most up to date~~ models and data ~~provided~~ for use in NYISO's *Interconnection Studies* **to** accurately simulate the performance of their compliant IBR plant per R1.1.”
3. Change the language in R2.1.: “~~Attest that~~ **Will design its** ~~their~~ IBR plant ~~will be designed~~ to be in compliance with the mandatory requirements of IEEE 2800-2022, as amended by "NYSRC Procedure for Application of IEEE 2800-2022 Standard for Large IBR Generating Facilities for the New York Control Area”
4. Change the language in R2.2.: “~~Attest that~~ **Provide** the **best and most up to date** models and data ~~provided~~ for use in NYISO's *Interconnection Studies* **to** accurately simulate the performance of their compliant IBR plant per R2.1.”
5. Add R3: “The NYISO shall perform assessments to ensure the model and data provided by Large IBR Generating Facility Developer meet R1 and R2 of PRR 151. If NYISO’s assessments identify deficiencies with the model and/or data provided, NYISO shall notify the Large IBR Generating Facility Developer within X<sup>1</sup> calendar days of identification of deficiencies. The Large IBR Generating Facility Developer shall resolve the deficiencies and provide corrected model and/or data to NYISO within X calendar days after notification.

In addition, to accompany the new R3, in 8. Section C – Compliance Elements:

6. Add M3: The NYISO certifies that assessments have been performed for model and data provided by each Large IBR Generating Facility Developer and that any identified deficiencies have been resolved.

## **B. 10. Comments**

In addition to the changes to the requirements listed above, AES would like to call attention to the exclusion of Section 10 – Modeling Data of IEEE 2800 from PRR 151. AES requests confirmation that developers are to follow the *Reliability Rules & Compliance Manual*<sup>2</sup>: I. Modeling and Data, I.4 Transmission Data when submitting modeling and data on their IBRs, as described in the requirements.

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<sup>1</sup> Number of days to be decided by NYSRC and NYISO

<sup>2</sup> New York State Reliability Council, Reliability Rules & Compliance Manual. Version 46. June 10, 2022.  
<https://www.nysrc.org/wp-content/uploads/2023/07/RRC-Manual-V46-final.pdf>



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### **C. 6. Section A – Reliability Rule Elements, 2.**

1. AES suggests a change to “NERC: All Standards under review for IBR Application **per FERC Order 901 and RD22-4.**”

### **D. Clause 4: General Interconnection Technical Specifications And Performance Requirements**

AES suggests that NYSRC adopt the language and requirement from IEEE 2800, 4.2 Reference Points of Applicability (RPA) to replace the language in Clause 4.2 of PRR 151 Procedure Document. AES recommends that the RPA is assessed and determined on a project-by-project basis and the final determination of the RPA is agreed upon by the TO and the project developer/owner.

1. Replace Clause 4.2 with: “Reference points of applicability (RPA). RPA for ac-connected IBR. Except as otherwise stated in this standard, the *reference point of applicability* (RPA) for all technical minimum requirements for the interconnection, capability, and performance requirements in this standard shall be the *point of measurement* (POM) of the IBR plant as shown in Figure 1. The interconnecting *TS owner/TS operator* may adapt some or all performance requirements, as specified in this standard, and move their respective RPA to another location, including the *point of interconnection* (POI).

### **E. Clause 7 – Response To TS Abnormal Conditions**

1. Clause 7.2.2.3.4 is listed twice in Section 7 #5 and #6 and should be re-numbered.

AES appreciates being able to comment on the final PRR 151 draft and looks forward to additional stakeholder discussions.

Sincerely,

Katherine Bennett  
Lead Regulatory Analyst  
AES Clean Energy