



GE Comments to PRR-151, draft dated 11-10-2023

Submitted Dec 22, 2023

GE submits the following comments to latest revision of PRR-151, Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No.1-11).

Clause 5

Item 5: Clause 5.2.2: Recommend to modify "...when the system short-circuit strength at the RPA is the minimum short-circuit strength identified..." to "...when the system short-circuit strength at the RPA is *equal to or above* the minimum short-circuit strength identified..." for clarity.

Item 5: Clause 5.2.2: The 10 second maximum step response time is more aggressive than typical responses today in many locations and could be problematic in weak grids and possibly in situations with multiple plants in close proximity, if not coordinated. The damping ratio of 0.3 may not be achievable for a 10 second response in weak grids, so language should be added to address such a situation.

Clause 7

Item 7: Clause 7.2.2.3.5: Recommend removing the last sentence of this item. This infers that utilization of this settling time and settling band is in all cases beneficial and should be targeted as a goal; in fact, there are grid conditions where implementation of the settling time requirement could cause instability and should be avoided. GE Vernova can provide further information on the risks of using this requirement where not beneficial, or as a default requirement.

Item 8: Clause 7.2.2.4: Design of proper control responses and associated models requires validation and testing of the product. Unless defined prior to OEM design processes, requested ride-through performance requirements from a project-specific study would need to be within the capabilities of the equipment. Language must be added to address this situation.

Item 10: Clause 7.2.2.6: IEEE 2800-2022 defines the settable range for active power recovery as 1-10 seconds (default 1 second), but the language here states "less than or equal to one second". Recommend changing this to "equal to on second", otherwise clarifying language is needed that explains that there could be a requirement for less than one second recovery, which is outside of the standard.