

WORK PLAN FOR DEVELOPMENT OF A NYSRC POTENTIAL RELIABILITY RULE FOR VERIFICATION OF AS-BUILT IBR PLANT CONFORMANCE

OBJECTIVE: Development of a Potential Reliability Rule PRR 155 - Establishing New York Control Area (NYCA) Conformance Standards for Test and Verification of Performance of As-Built Large IBR Generating Facilities. PRR 155 will cover more specific and/or more stringent requirements for verification of performance of as-built IBRs in NYCA based on consideration of the following standards and guides:

1. IEEE 2800-2022 "IEEE Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems:
 - 1.1. Section 10 - Modeling Data
 - 1.2. Section 11 - Measurement data for performance monitoring and validation
 - 1.3. Section 12 - Test and verification requirements (excluding post-commissioning sections: 12.2.7 Post-commissioning monitoring, 12.2.8 Periodic tests and 12.2.9 Periodic verification, all of which will be covered in a future PRR)
2. IEEE 2800.2 - Guide for Test and Verification Procedures for Inverter Based Resources Interconnecting with Bulk Power Systems (approval expected Q2,2026¹)
3. NERC Standards and Guidelines approved or under ballot:
 - 3.1. PRC-029-1 - Frequency and Voltage Ride-through Requirements for Inverter-based Resources (approved 7/24/25)
 - 3.2. MOD-26-2 - Verification and Validation of Dynamic Models and Data (under ballot 8/14/25 - 9/10/25)
 - 3.3. MOD-32-2 - Data for Power System Modeling and Analysis (under ballot 8/8/25 - 9/10/25)
 - 3.4. Draft Reliability Guideline - Commissioning Best Practices for BPS-Connected Inverter-Based Resources (IRPS approved a 45 day ballot period on 8/21/25)
4. NPCC EMT Guideline? - need citation
5. NYISO EMT Guideline - UG28 Electromagnetic Transient (EMT) Model Guideline 6/24/2025
6. Other regional operating entities (ISO-NE, ERCOT, CAISO et al):
 - 6.1. NERC DRAFT White Paper: EMT Modeling Adoption for Interconnection and Planning Studies, An Industry Survey, June 2025

It is proposed to develop PRR 155 using the same format as PRR 151/RR B.5 for as-designed IBRs with a concise rule supported by an application procedure.

¹ IEEE 2800.2 is not yet complete but has already been through the first ballot with a ~92% approval rate. The Comments Resolution Group is now addressing balloter comments with appropriate draft revisions. However, these revisions appear to be relatively minor and limited. Thus, the present draft of P2800.2 is sufficiently firm for use as the basis for the initial stages of this workplan.

PROPOSED WORK PLAN

1. Review the above standards and guidelines to identify:
 - 1.1. The tasks and actions that need to be assigned to PRR 155
 - 1.2. Criteria and other options that need to be specified in PRR 155
 - 1.3. Possible revision to NYSRC RR B.5 to conform to PRC-029-1 requirements
 - 1.4. Framework for the processes and schedules for conformance verification
2. Meeting(s) with NYISO:
 - 2.1. Discuss the items identified in #1
 - 2.2. Address self-attestation vs. independent third-party evaluation vs. internal NYISO evaluation
 - 2.3. Auditing process for any option other than full internal evaluation
 - 2.4. NYISO resource capabilities
3. Draft PRR 155 per *NYSRC* Policy No. 1, "Procedure for Reviewing, Developing, Modifying, and Disseminating *NYSRC* Reliability Rules."
4. Disseminate PRR 155 to stakeholders:
 - 4.1. Re-convene stakeholder working group meetings (IBR WG) to review PRR 155
 - 4.2. Modify PRR, as required
 - 4.3. Presentations to wider stakeholder groups
5. NYSRC PRR Approval process per Policy 1

In parallel with the development of PRR 155, the IBR WG will monitor NERC's response to FERC Order 909 regarding NYSRC's IBR Exceptions Policy to identify possible changes.