

Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1-11)

Submit request to herb@poweradvisorsllc.com via the NYSRC site www.nysrc.org.

Item	Information
1. PRR No. & Title of Reliability Rule or Requirement change	PRR 155: Establish minimum interconnection standards for Large Inverter Based Resource (IBR) Generating Facilities based on IEEE Standard 2800-2022
2. Rule Change Requester Information	
Name	RRS
Organization	NYSRC
3. New rule or revision to existing rule?	Revised rule. B.5: Establishing New York Control Area (NYCA) Interconnection Standards for Large IBR Generating Facilities
4. Need for rule change, including advantages and disadvantages	PRR 155 is a revision to RR B.5 (As-designed IBR interconnections) to include modeling, test and verification requirements for as-built IBR plants based on: - IEEE 2800-2022 "Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems" and - IEEE 2800.2 - 2026 "Recommended Practice for Test and Verification Procedures for Inverter-based Resources Interconnecting with Bulk Power Systems" The advantage to immediate adoption of PRR 155 is that it establishes minimum as-built IBR interconnection criteria and the processes needed to verify that these criteria are achieved. These changes are critical to NYCA reliability as NYCA transitions to higher penetration of inverter-based resources per CLCPA mandates. There are no disadvantages.
5. Related NYSRC rules	Reliability Rule B.4 - Transmission System Interconnection Special Studies Reliability Rule I - Modeling and Data, I.4 - Transmission Data
6. Section A – Reliability Rule Elements	
1. Reliability Rule	NYISO's Interconnection Studies for Large IBR Generating Facilities (>20 MW) shall be based on IBR Plants compliant with the IEEE 2800-2022 Standard as amended for NYCA application, and their associated IBR models and data.
2. Associated IEEE, NERC and NPCC Standards, Criteria, and Guidance Documents	NPCC: Directory 1 NERC: All Standards and guidance documents under review for IBR application including: - PRC-029-1 - Frequency and Voltage Ride-through Requirements for Inverter-based Resources (Effective 10/1/26). PRC-029-2 revision under ballot 5/18/26. - MOD-26-2 - Verification and Validation of Dynamic Models and Data (Effective 4/1/26). - MOD-32-2 - Data for Power System Modeling and Analysis (Effective 4/1/28) - FAC-002-5 - Project 2022-04 EMT Modeling. - Reliability Guideline: Commissioning Best Practices for BPS-Connected Inverter Based Resources (June 2026).

Added "as-built" requirements to existing as-designed requirements - mostly EMT

Added new regs relevant to "as-built" standards, model verification, model validation & best practices

Added new regs relevant to "as-built" standards, model verification, model validation & best practices	• Whitepaper IBR Equipment EMT Model Validation (June 2026) • IEEE: Standards & Recommended Practice documents: • IEEE 2800-2022 "IEEE Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems". • IEEE 2800.2 - 2026 "Recommended Practice for Test and Verification Procedures for Inverter-based Resources Interconnecting with Bulk Power Systems".
3. Applicability	Interconnection Studies of Large IBR Generating Facilities

7. Section B - Requirements R1.2.1 - reworded from RR B.5, no functional change R1.2.2 - new requirement for pre-commissioning testing, verification, design evaluation & reporting, with third party confirmation of compliance R1.2.3 - new requirement for as-built evaluation, commissioning testing, model validation & reporting, with third party confirmation of compliance R2 is mirror image of R1. R1 defines NYISO's procedural requirements, R2 defines GO's requirements to comply with R1	R1. The NYISO shall prepare and maintain procedures for the NYISO's <i>Interconnection Studies</i> process requiring that <i>Large IBR Generating Facility Developers</i>: R1.1. Attest that 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". R1.2. Attest that their IBR plant models, data and test results accurately simulate the performance of their compliant IBR plant per R1.1: R1.2.1. Attestation of compliance of models and data for the IBR plant as submitted to the NYISO's Cluster Study Process. R1.2.2. Attestation of compliance of the final IBR plant design prior to commissioning, including: • Validation of IBR Unit & Power Plant Controller (PPC) models, • Plant model verification, and • Plant design evaluation based on simulation studies. R1.2.3. Attestation of compliance of as-built and tested IBR plant, including: • Installation evaluation, • Commissioning tests, and • Post-commissioning model validation. R2. Each Large IBR Facility Developer subject to the NYISO's <i>Interconnection Studies</i> process shall: R2.1. Attest that 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". R2.2. Attest that their IBR plant models, data and test results accurately simulate the performance of their compliant IBR plant per R2.1: R2.2.1. Attestation of compliance of models and data for the IBR plant as submitted to the NYISO's Cluster Study Process. R2.2.2. Attestation of compliance of the final IBR plant design prior to commissioning, including: • Validation of IBR Unit & Power Plant Controller (PPC) models, • Plant model verification, and
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	- Design evaluation. R2.2.3. Attestation of compliance of as-built and tested IBR plant, including: - Installation evaluation, - Commissioning tests, and - Post-commissioning model validation.
8. Section C – Compliance Elements	
1. Measures	M1. The NYISO self-certified and provided evidence that it had procedures in place for implementing the Large IBR Generating Facility Developer's interconnection requirements in accordance with R1. M2. The NYISO certified that each Large IBR Generating Facility Developer attested to its requirements in accordance with R2.
2. Levels of Non-Compliance	<u>2.1 Measure 1:</u> Level 1: Not applicable. Level 2: The NYISO failed to have procedures covering requirement R1.1. Level 3: The NYISO failed to have procedures for one or more requirements in R1.2. Level 4: Not applicable. <u>2.2 Measure 2:</u> Level 1: Not applicable. Level 2: The NYISO certified that the required attestation was not submitted to the NYISO in accordance with requirement R2.1 Level 3: The NYISO certified that the required attestation was not submitted to the NYISO in accordance with one or more requirements in R.2.2. Level 4: Not applicable.
3. Compliance Monitoring Process (See Policy 4)	No change.
3.1 Compliance Monitoring Responsibility	No change.
3.2 Reporting Frequency	No change
3.3 Compliance Reporting Requirements	No change
	Revision to reference NYISO's cluster procedure
9. Implementation Plan	This revised rule to be applicable to all Large IBR Generating Facilities subject to NYISO's OATT Attachment HH - Standard Interconnection Procedures.

No tariff change required	The rule will be implemented on the latter of (a) January 1, 2027 or (b) the effective date of revisions to necessary NYISO procedures in accordance with NYISO's governance process following the approval by NYISO stakeholders.

10. Comments Revision to reference NYISO's cluster procedure To be done concurrent with PRR 155 PRC-029-2 is more restrictive regarding exceptions (exemptions) than NYSRC's Policy 1 To be done later	- The following definitions contained in the NYSRC Reliability Rules & Compliance Manual Glossary will be updated: "Interconnection Studies" - The studies and procedures outlined in the NYISO's OATT Attachment HH and Transmission Expansion and Interconnection Manual. "Large Inverter Based Resource (IBR) Generating Facility" – The IEEE Standard 2800-2022 definition of a grouping of one or more IBR unit(s) and possibly supplemental IBR device(s) operated by a common Facility level controller along with a collector system to achieve the performance requirements of this standard at a single reference point of applicability (RPA) and having an aggregate capacity of greater than 20 MWs. - In addition to the procedures outlined in Attachment HH of the OATT and the NYISO's Transmission Expansion and Interconnection Manual, the Standard Interconnection Agreement (SIA), Attachment HH, Section 40.25.15, Appendix 15, defines the terms and conditions among the NYISO, the Interconnection Customer, and the Connecting Transmission Owner. The SIA currently provides for the submission by the Interconnection Customer of specific information regarding the electrical characteristics of its facility in accordance with Applicable Reliability Standards, as defined in Attachment HH, and as detailed in the SIA (e.g., modeling and testing information through the engineering, construction and procurement, commissioning, and post-commissioning phases). - Revise RR I.4 to include EMT models/data. IBR models and data for IBR plant compliant with IEEE Standard 2800-2022 may be modified as the IBR plant progresses through the interconnection process. The procedures for obtaining the as-designed models and data, and their updating during the various stages of interconnection are addressed by NYSRC's existing Reliability Rule I - Modeling and Data, I.4 - Transmission Data - Revise NYSRC's Policy 1, Section 5 "Exceptions to the Reliability Rules" to recognize the restrictions on IBR exemptions in NERC's PRC-029-2 "Frequency and Voltage Ride-through Requirements for Inverter-Based Resources". - Exclusions from the requirements in IEEE 2800-2022 for this PRR are: - Clause 8: Power Quality - Clause 11: Measurement Data for Performance Monitoring and Validation
11. Date Rule Adopted	

12. PRR Revision Dates	1/8/26, 4/16/26, 5/18/26, 6/13/26, 6/25/26, 6/29/26
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DRAFT

NYSRC Procedure for Application of IEEE 2800-2022 Standard for Large IBR Generating Facilities for the New York Control Area

All normative mandatory requirements¹ specified in IEEE 2800-2022 (the *Standard*) shall be mandatory for interconnection of *Large IBR Generating Facilities* in the New York Control Area with the exceptions, modifications, clarifications, and additional requirements as specified in this document. Additionally, all procedures or specifications indicated as “should” in IEEE 2800.2-2026 (the *Recommended Practice*) shall be considered mandatory unless it is established that alternative procedures or specifications are used which are equivalent in determining the conformance of the Facility with the performance requirements of the *Standard* as modified by this document.²

All other italicized words in this procedure document are terms specifically defined in IEEE 2800 and these definitions shall apply.

IEEE 2800-2022 Requirements as amended by NYSRC

CLAUSE 1 – OVERVIEW

1. Clause 1.4 – General Remarks and Limitations

Application of the Standard is specified by New York State Reliability Council's Reliability Rule B.5 - NYISO's Interconnection Studies for Large (≥ 20 MW) IBR Generating Facilities shall be based on IBR Plants compliant with the IEEE 2800-2022 Standard as amended for NYCA application, and their associated IBR models and data.

CLAUSE 2 – NORMATIVE REFERENCES

Adopted in full.

CLAUSE 3 – DEFINITIONS, ACRONYMS, AND ABBREVIATIONS

Adopted in full.

CLAUSE 4 – GENERAL INTERCONNECTION TECHNICAL SPECIFICATIONS AND PERFORMANCE REQUIREMENTS

1. Clause 4.2 – Reference Point of Applicability (RPA location)

The *Reference Point of Applicability (RPA)* shall be the *Point of Interconnection (POI)* with the exception of requirements specified in Clauses 7.2.2.3.4 and 7.2.2.3.5 of the Standard for which the RPA shall be at the *Point of Connection (POC)*, or at the Point of Measurement (POM) by mutual agreement between the NYISO, interconnection Transmission Owner and the IBR Plant Developer.

¹ IEEE standards use “shall” as the operative verb for mandatory requirements. Standards may include recommendations, using the verb “should” or guidelines using the verb “may” which are not mandatory.

² Because Large IBR Facility testing and verification practices are not fully mature at this time, the IEEE Standards Association determined that the testing and verification standard associated with IEEE 2800-2022 (IEEE 2800.2-2026) would be a “Recommended Practice”. IEEE Standards Association rules do not permit the use of “shall” in a Recommended Practice type of standard.

CLAUSE 5 – REACTIVE POWER-VOLTAGE CONTROL REQUIREMENTS WITHIN THE CONTINUOUS OPERATION REGION

1. Clause 5.1 – Reactive Power Capability (Supply of reactive power support)

Reactive power support shall be supplied to the *Transmission System*, within the defined range of reactive power capability specified in Clause 5 of the Standard whenever active power is delivered to the *Transmission System*, or absorbed from the *Transmission System* at a level greater than electrical losses within the *IBR plant* and the *Interconnection System* between the *POI* and *POM*. Supply of reactive power and voltage support, and related voltage setpoint and regulation droop parameters, shall be as directed by the *Transmission System Operator* (NYISO).³

2. Clause 5.1 – Reactive Power Capability (dynamic reactive power)

~~2. Clause 5.1 – Reactive Power Capability (reactive power support at or near zero active power)~~

~~Plant capability for reactive power at all active power levels between zero and *ICR*, or *ICAR* and *ICR* in the case of bidirectional *IBR plants* having energy storage capability, is required as specified in Clause 5 of the Standard. Except for *IBR plants* having energy storage capability, supply of reactive power support at net active power export levels less than or equal to zero shall not be required unless agreed to by the NYISO and *IBR owner* as an Ancillary Service. For *IBR plants* containing energy storage capability, supply of reactive power support shall not be required at levels of power import required to meet plant standby loss (i.e., provide power to plant auxiliary loads). Reactive power supply may be required when the plant is in standby mode if agreed to by the NYISO and *IBR owner* as an Ancillary Service. In that case, reactive power support within the ranges defined by Clause 5 of the Standard shall be continuously maintained during transitions from power export to import and import to export. Supply of reactive power support at net power levels within these exclusions is optional.~~

2. Clause 5.2.2 – Voltage Control (dynamic performance)

The voltage control small-signal dynamic performance specified in Table 5 of the Standard shall be applicable when the system short-circuit strength at the RPA is equal to or above the minimum short-circuit strength identified in cases provided by the NYISO for a minimum feasible generation scenario and NYSRC Reliability Rules, Table B-1, Category I, Item 2 contingencies (Opening of elements without fault) local to the POI. The maximum step response time for this condition shall be less than 15 seconds.

³The Standard only requires that the IBR be designed to have the capability to provide reactive power. This additional requirement mandates that this reactive capability be provided (supplied) to the transmission system in order to hold voltage schedule or as otherwise directed by NYISO operations.

⁴As an example, consider an IBR plant rated 150 MW connected to a 230 kV system and with a 236 kV voltage reference value and 6% voltage droop (on ICR base, as defined in the Standard) specified by the NYISO system operator. The voltage control shall hold the RPA voltage to 236 kV $\pm$ 2.3 kV $\pm$ the droop value. If the reactive power injection to hold voltage to the reference, as adjusted for droop, is 30 MVAR, the droop value is $-30/150 \times 0.06 \times 230 = -2.76$ kV. Therefore, the actual RPA voltage must be between 230.9 kV and 235.6 kV for compliance in this example.

For any transmission system conditions within the planning design criteria defined by the New York State Reliability Council, voltage control performance shall be positively damped.

CLAUSE 6 – ACTIVE-POWER—FREQUENCY RESPONSE REQUIREMENTS

1. Clause 6.1.1 – PFR Capability (supply of primary frequency response)

Primary frequency response, for which the capability is defined in Clause 6.1.1, shall be supplied to the *Transmission System* as a mandatory requirement, within the constraints of the *available active power* and the *IBR plant's minimum active power capability*, and is not subject to *IBR owner* mutual agreement. Supply of primary frequency response and the relevant control frequency response control parameters (e.g., droop, dead band) shall be as directed by the *Transmission System Operator* (NYISO).⁵ Pre-curtailment of active power to provide an underfrequency response is not required. If the *IBR plant* active power has been curtailed to less than the *available active power* for any reason, supply of underfrequency response, to the extent of the *available active power*, is mandatory. The *IBR plant* shall be designed such that there is capability for underfrequency response to override power curtailment limits. In operation, selection of whether the underfrequency response or the power curtailment limits have priority shall be at the discretion of the NYISO System Operator as indicated by the NYISO in its curtailment order.

CLAUSE 7 – RESPONSE TO TS ABNORMAL CONDITIONS

1. Clause 7.2.2.1 – General Requirements and Exceptions (RPA location)

The *Reference Point of Applicability (RPA)* for voltage *ride-through* requirements shall be the *Point of Interconnection* with the exception of requirements specified in the Standard to be applicable at the *IBR unit Points of Connection (POCs)*.

2. Clause 7.2.2.2 – Voltage Disturbances Within Continuous Operating Region (temporary power deviations)

Active power changes, due to voltage deviations for which all *applicable voltages* at the *RPA* remain within the *continuous operating region* shall not cause a change in active power greater, in per-unit of the *ICR* (or the *ICAR* for energy storage in the charging mode), than twice the magnitude of abrupt voltage change, in per-unit of the nominal voltage for greater than or equal to 0.05 seconds. The active power output shall return to within ± 0.05 p.u. of the lesser of the pre-disturbance active power and the *available active power*, on the base of the *ICR* or *ICAR*, as applicable, within one second of the disturbance.

⁵The Standard only requires that the *IBR* be designed to have the capability to provide primary frequency response. This additional requirement mandates that primary frequency response be provided (supplied) to the transmission system as directed by NYISO operations.

3. Clause 7.2.2.2 – Voltage Disturbances Within Continuous Operating Region (extended voltage imbalance)

In addition to the exceptions to requirements for *continuous operation* stated in this clause of the Standard, the *IBR plant* may also trip for negative sequence component of the *applicable voltage* exceeding 6.7% of the *nominal voltage* for a duration exceeding two seconds.

4. Clause 7.2.2.3.2 – Low and High-Voltage Ride-Through Capability (reactive power priority in mandatory operation range)

The *IBR plant* shall operate in *reactive current priority mode* during high- and low-voltage *ride-through* events within the *mandatory operating range*. The relationships between voltage deviation at the *POCs* of *IBR units* and the reactive components of current from these units shall be determined by NYISO based on interconnection studies with consideration of the characteristics of the *IBR units*, with default relationships as proposed by the *IBR owner*. The *IBR plant* shall perform according to these specifications determined by NYISO, which may differ for voltage deviations above and below the *continuous operating range*.

5. Clause 7.2.2.3.4 – Current Injection During Ride-Through Mode (negative sequence current injection during ride-through)

The relationship between the negative sequence component of *IBR unit* currents and the negative sequence components of the respective *POC* negative sequence voltage components is not specified by this document. The required relationship may be specified by the Connecting Transmission Owner in the Interconnection Agreement.

6. Clause 7.2.2.3.4 – Current Injection During Ride-Through Mode (negative sequence current injection from type 3 wind turbines)

Negative sequence currents of Type 3 (doubly fed asynchronous generator) wind turbines, shall not be required to follow a predefined proportional relationship to the negative sequence voltages at the *POCs*.

7. Clause 7.2.2.3.5 – Performance Specifications (ride-through dynamic performance requirement applicability)

The dynamic performance requirements specified in Table 13 of the Standard for *IBR unit* terminal current are desired with the exception of the settling time and settling band requirements, and shall be applicable to all contingencies within the Planning Design Criteria defined by the New York State Reliability Council. The settling time and settling band requirements of Table 13 are recommended goals for typical system conditions and are not mandatory.

8. Clause 7.2.2.4 – Consecutive Voltage Deviations Ride-Through Capability (ride-through for dynamic voltage oscillations)

Where interconnection system impact studies for an *IBR plant* indicate post-fault voltage oscillations repeatedly exceeding the limits of the *continuous operating region*, the studies shall define voltage

ride-through performance requirements applicable to such situations. The *IBR plant* shall provide the performance thus required.

9. Clause 7.2.2.4 – Consecutive Voltage Deviations Ride-Through Capability (energy dissipative device limitations)

Where *IBR plants* interconnected to the New York Transmission System via HVDC transmission apply energy dissipative devices to meet *ride-through* requirements, the *IBR plant* interconnection studies shall define the credible magnitude and duration of repeated fault events, within the time frame of the energy dissipative device's thermal cool-down period, that may be credibly experienced within New York Reliability Council planning design criteria and reasonable engineering judgement. The defined event scenario shall be applied as the minimum duty cycle requirements and energy ratings of the dissipative devices. Exceptions to the requirements of Clause 7.2.2.4 of the Standard shall be subject to any more stringent or specific requirements of NERC, NPCC or NYSRC. These exceptions shall specifically include dc choppers and similar devices used for interconnection of generation resources with the New York Transmission System via HVDC tie lines.

10. Clause 7.2.2.6 – Restore Output after Voltage Ride-Through (Recovery Time)

If interconnection studies reveal that IBR plant voltage disturbance recovery times for active power equal to or close to one second may result in voltage collapse, delayed voltage recovery, or other adverse system performance consequences and a slower recovery time is deemed to be favorable , to the New York Transmission System, a suitable recovery time less than ten seconds shall be specified by the NYISO.

CLAUSE 8 – POWER QUALITY

Excluded.

CLAUSE 9 – PROTECTION

Adopted in full.

CLAUSE 10 – MODELING DATA

Adopted in full.

CLAUSE 11 – MEASUREMENT DATA FOR PERFORMANCE MONITORING AND VALIDATION

Excluded are the last four rows of Table 19 which involve measurements specifically related to power quality performance; rapid voltage change, short-term harmonics, long-term harmonics

CLAUSE 12 – TEST AND VERIFICATION REQUIREMENTS

1.0 ATTESTATIONS

The Generator Owner shall submit three attestations and associated modeling data to the NYISO as detailed below:

- 1.1 **Cluster Study Requirements** - The Generator Owner shall submit to the NYISO, at the time of interconnection request, models for use by NYISO and its consultants in the Cluster Study Process that replicate the performance of their proposed IBR plant and an attestation that these models exhibit performance compliant with the *Standard*, as amended by this document.
- 1.2 **Pre-Commissioning Testing** - The Generator Owner shall submit to the NYISO, upon finalization of plant design and prior to entering commercial operation, an attestation that states compliance with the requirements in Section 2.0 below.
- 1.3 **Commissioning Testing** - The Generator Owner shall submit to the NYISO no later than 365 days after the date of commercial operation, an attestation that states compliance with the requirements of Section 3.0 below.

2.0 Pre-Commissioning Testing

- 2.1 **Validation of IBR Unit and PPC Models** - The validity of IBR unit and Power Plant Controller (PPC) models shall be confirmed by comparison of type test results and simulations of the type tests using these models using the procedures specified in Clause 6 of the *Recommended Practice*:
 - 2.1.1 All IBR units and plant controllers shall be type tested in accordance with the type test procedures specified in Clause 5 of the *Recommended Practice*.
 - 2.1.2 EMT models of IBR units and plant controllers shall be validated against the respective type test results in accordance with Clause 6 of the *Recommended Practice*.
 - 2.1.3 The Generator Owner shall provide a comprehensive Model Validation Report that includes the following items:
 - 2.1.3.1 Description of test conditions relevant to the test results (e.g., source impedances, method used to perform ride-through tests, etc.).
 - 2.1.3.2 Measures taken to replicate test conditions in the EMT simulations of the type tests.
 - 2.1.3.3 Type test results documented as specified in the *Recommended Practice*.
 - 2.1.3.4 Simulation results using the IBR unit and IBR plant controller models for comparable tests.
 - 2.1.3.5 Analysis and explanation of differences between type test and simulation results, including assessment of whether differences are material.
- 2.2 **Design Evaluation** - A plant model of the *Large IBR Generating Facility*, consisting of validated IBR unit models, power plant control (PPC) model(s), supplemental IBR devices, and balance of plant component models, shall be constructed and used to evaluate performance of the *Large IBR Generating Facility* with respect to the applicable performance requirements of the

Standard as modified by this document. This design evaluation shall be performed in accordance with Clause 7 of the *Recommended Practice*:

2.2.1 All IBR unit and plant controller models used for design evaluation shall be validated.

2.2.2 All IBR unit and plant controller models used for design evaluation shall reflect the actual makes, models, and controller firmware versions of the as-built equipment.

2.2.3 The plant model used for design evaluation shall represent the detail, topology, and parameters of the plant with aggregations and simplifications permitted to the extent that verification of plant performance in accordance with the *Standard* is not materially compromised, and has been verified in accordance with Clause 7.2 of the *Standard*.

2.2.4 The Generator Owner shall specify a system representation that is adequate for each test appropriate to local conditions, such that it allows the demonstration of conformity in accordance with performance requirements specified.

2.2.5 The Generator Owner shall provide a comprehensive Design Evaluation Report that includes:

2.2.5.1 Comparison of the verified plant model and the fully detailed single-line diagram of the plant. All simplifications and aggregations shall be clearly identified with justifications provided.

2.2.5.2 Benchmarking of plant model performance between the simulation domains employed for Design Evaluation.

2.2.5.3 Plotted results for each of the tests specified in Clause 7.3 of the *Recommended Practice* with exception of test specified in subclause 7.3.5 (harmonic performance).

2.2.5.4 Results of all Design Evaluation Simulations demonstrating compliance with the requirements of the *Standard*.

2.3 Attestation - The Generator Owner shall submit to the NYISO upon finalization of plant design and prior to entering commercial operation, an attestation that states compliance with the following requirements:

2.3.1 That it has performed IBR unit and supplemental IBR device model validations in accordance with Clause 6 of the *Recommended Practice*.

2.3.2 That the IBR facility models used to represent the *Large IBR Generating Facility* have been verified in accordance with Clause 7.2 of the *Recommended Practice* to be an accurate representation of the equipment that will be installed or has been installed on site.

2.3.3 That it performed, prior to plant entering commercial operation, the design evaluation specified in Clause 7.3 of the *Recommended Practice* and that the *Large IBR Generating Facility* meets applicable performance requirements of the *Standard*, as amended by this document.

2.3.4 That the Generator Owner has created Model Validation and Design Evaluation Reports covering all items in 2.3.1 through 2.3.3 above, and submitted said reports to a Third Party Consultant for review, and to the NYISO upon request.

2.3.5 That the third-party consultant has reviewed the Model Validation and Design Evaluation Reports and certifies in writing that all simplifications and aggregations in the model are reasonable and immaterial to the conclusions, and that the *Large IBR Generating Facility* can be expected to perform in accordance with the requirements of the *Standard*, as amended by this document.

2.3.6 That the third-party consultant performing this review is an independent qualified entity competent in the review of the information described in the Model Validation and Design Evaluation Reports, with no common ownership with the Generator Owner, was not involved in the development of models or design of the plant, and has been offered no incentives to reach any specific conclusion.

3.0 Commissioning Testing

3.1 As-Built Installation Evaluation - The consistency of models and parameters used in the design evaluation with the as-built Large IBR Generating Facility shall be confirmed in accordance with the procedures specified in Clause 8 of the *Recommended Practice*:

3.1.1 The Generator Owner shall verify that the as-built IBR Plant is consistent with the models used in the Design Evaluation, including:

3.1.1.1 IBR units are of the same make, model, and firmware version

3.1.1.2 Adjustable parameter settings

3.1.1.3 Plant topology

3.1.1.4 Balance of plant parameters (e.g., transformer impedances)

3.1.2 If the as-built evaluation identifies changes to the facility or other material discrepancies between the models used for Design Evaluation and as-built conditions, revision of models and re-performance or partial re-performance of the design evaluation shall be required. Any design evaluation re-performance shall be performed in accordance with the design evaluation procedures as specified in this document.

3.2 Commissioning Tests - Tests shall be performed at the commissioning of the *Large IBR Generating Facility* but prior to entering commercial operation that confirm, to the extent possible, performance in conformity with the requirements of the *Standard* as amended by this document. Commissioning Tests shall be performed and documented in conformance with Clause 9 of the *Recommended Practice*:

3.2.1 The Generator Owner shall submit a detailed Commissioning Test Plan to the Transmission Owner ninety (90) days prior to commencement of plant commissioning tests.

3.2.2 Commissioning tests shall include each of the performance tests specified in Clause 9 of the *Recommended Practice*, with exception of tests specified in Sub-Clauses 9.11 through 9.14.

3.2.3 If the Transmission Owner wish to propose modifications to the Commissioning Test Plan, those modifications shall be submitted within fourteen (14) days of the Generator Owner's transmittal of the Commissioning Plan to the Transmission Planner.

Alternatively, the Transmission Owner may indicate that no changes to the Commissioning Test Plan are needed.

3.2.4 The Generator Owner shall perform the commissioning in accordance with the Commissioning Test Plan. Representatives of the Transmission Owner shall be permitted to witness the commissioning tests.

3.2.5 The Generator Owner shall provide Commissioning Test results in a Commissioning Test Report in sufficient detail to demonstrate conformance of the *Large IBR Generating Facility* performance to the requirements of the *Standard*, as modified by this document, and to allow comparison with results of simulations of the commissioning tests using the plant model to assess plant model accuracy.

3.3 Commissioning Model Validation - The Generator Owner shall perform Commissioning Model Validation of the *Large IBR Generating Facility* in accordance with Clause 10 of the *Recommended Practice*. The Commissioning Report shall be supplemented with comparisons of the actual test results with simulations of the same events and the system conditions present at the time of the commissioning tests, to the extent that these conditions can be determined, using the IBR plant models that were used in the Design Evaluation step:

3.3.1 Any material deviations between simulated and actual performance, not reasonably attributable to unknown transmission system characteristics, shall be investigated and resolved by the Generator Owner.

3.3.2 Any model changes necessary to resolve discrepancies may require repetition of some or all the Design Evaluation to confirm that Plant performance is compliant with all requirements of the *Standard*, including requirements not directly confirmable by field testing (e.g., fault ride-through performance).

3.3.3 The Generator Owner shall document the Commissioning Model Validation in the Commissioning Test Report including comparisons between commissioning tests results and comparable simulation results with explanations of any significant differences with justification that any such differences are immaterial.

3.4 Attestation - The Generator Owner shall submit to the NYISO no later than 365 days after the date of commercial operation, an attestation that states compliance with the following:

3.4.1 That it performed, prior to *Large IBR Generating Facility* entering commercial operation, a verification that the as-built installation and the models used to represent the facility are compliant with the factors listed in Annex G of the *Standard*.

3.4.2 That commissioning tests of the facility have been performed in accordance with Clause 9 of the *Recommended Practice*.

3.4.3 That the commissioning test results are accurate and consistent with *Recommended Practice*.

3.4.4 That *Large IBR Generating Facility* performance exhibited during commissioning tests are in compliance with the *Standard* as amended by this document.

3.4.5 That Commissioning Model Verification has been performed in accordance with Clause 10 of the *Recommended Practice* and that the model of the *Large IBR Generating*

Facility, not inclusive of the external transmission system representation, is identical to the model used for Design Evaluation.

3.4.6 That there are no material differences in the *Large IBR Generating Facility* performance between commissioning test results and simulations of the same events and system conditions performed in the Post-Commissioning Model Verification.

3.4.7 That the current facility models submitted to NYISO remain an accurate representation of the installed equipment (e.g., inverter and control settings, protection settings, etc.) and plant design (e.g., transformed ratings and parameters, inverter type and model, collector impedances, etc.).

3.4.8 That the Generator Owner has created a Commissioning Test Report covering all items in 3.4.1 through 3.4.7 above, and submitted said report to a Third Party Consultant for review, and to the NYISO upon request.

3.4.9 That the third-party consultant has reviewed the Commissioning Test Report and certifies in writing that the commissioning test results are in conformance with performance requirements of the Standard, and that the Post-Commissioning Model Verification does not find any material discrepancies in the accuracy of the *Large IBR Generating Facility* model as used in the Design Evaluation.

3.4.10 That the third-party consultant performing this review is an independent qualified entity, competent in the review of the information described in the Commissioning Test Report, with no common ownership with the Generator Owner, was not involved in the development of models or design of the plant, and has been offered no incentives to reach any specific conclusion.