

Reliability Forum

FERC Order 901 – Data and Model Validation and Related Topics

Facilitators:

Gerry Dunbar

Director, Communications and Stakeholder Outreach

Faisal Nahian

Communications and Solutions Manager

August 7, 2025





Forum Agenda

9:00 a.m.	Welcome and Safety Message	Gerry Dunbar – NPCC – Director, Communications and Stakeholder Outreach
9:05 a.m.	Forum Disclaimer and Antitrust Compliance Guidelines	Faisal Nahian – NPCC – Communications and Solutions Manager
9:10 a.m.	NPCC Reliability Forum Outreach Efforts	Gerry Dunbar – NPCC – Director, Communications and Stakeholder Outreach
9:15 a.m.	IBR Category 2 Registration and Initial Compliance Expectations	Tracy D. MacNicoll – NPCC – Senior Entity Risk Assessment Analyst
9:35 a.m.	FERC Order 901 Milestone 3 Standards Update	JP Skeath – NERC – Manager, Engineering & Security Integration
10:10 a.m.	Modernization of Standards Processes and Procedures Task Force Whitepaper	Todd E. Lucas – Southern Company – Vice President, Transmission Operations & Policy Brett A. Kruse – Calpine Corporation – Vice President, Market Design
10:45 a.m.	B R E A K	
10:50 a.m.	Practical Impacts and Recommendations for Order 901 Milestone 3 Activities	Ryan Quint – Elevate Energy Consulting – President and CEO
11:20 a.m.	Electronic Modeling Lessons Learned & Challenges for Inverter-Based Resources (IBRs)	Todd Chwialkowski – EDF Power Solutions North America – Director, Transmission Regulatory & Compliance
11:50 a.m.	Forum Survey and Closing Remarks	Gerry Dunbar – NPCC – Director, Communications and Stakeholder Outreach



Safety Message

- Public transportation safety awareness



Reliability Forum Disclaimer

Webinar Logistics

- Participants are muted.
- Use the “Q&A” feature to submit questions.
- Questions will be addressed at the end of each presentation.
- The forum will be recorded.
- Presentation materials will be posted on the NPCC website.

Public Advisory

- This is a public webinar.
- Audience may include press and government representatives.
- Speakers should be mindful of the diverse audience.

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- Costs, discounts, terms of sale, profit margins or anything else that might affect prices;
- The resale prices their customers should charge for products they sell them;
- Allocating markets, customers, territories or products with their competitors;
- Limiting production;
- Whether or not to deal with any company; and
- Any competitively sensitive information concerning their company or a competitor.



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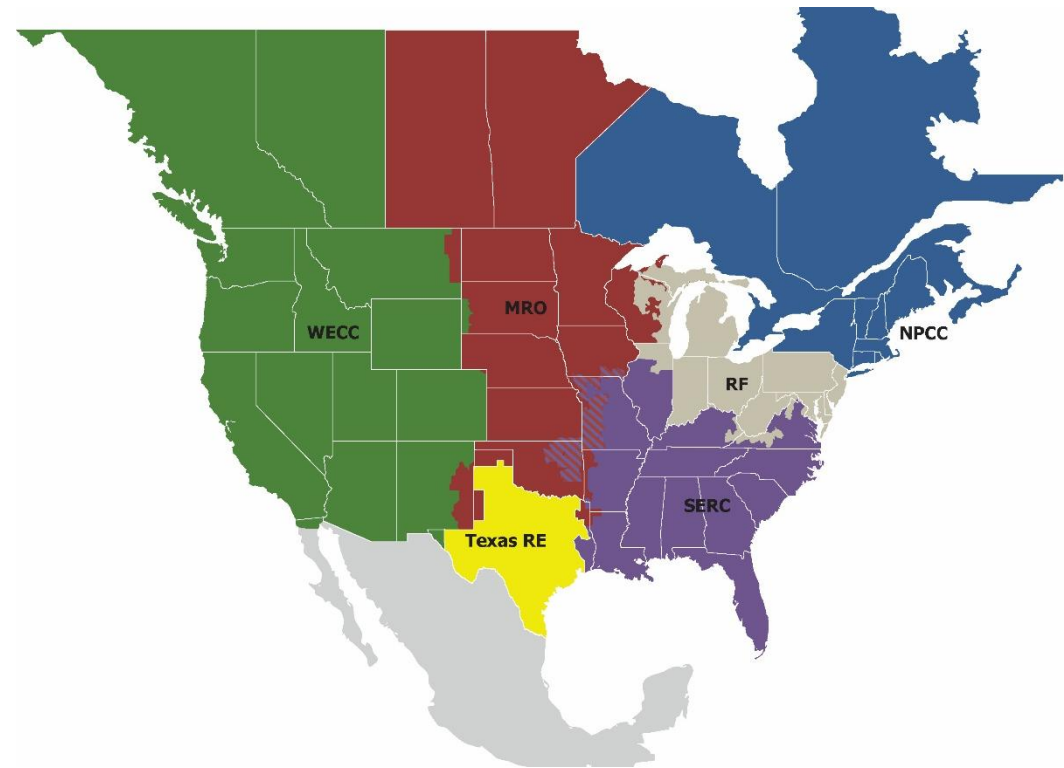


NPCC Long Term Strategy

To assure effective and efficient reduction of risks to the reliability and security of the grid

2025 Outreach Activities

- **Reliability Forums - March, May, Aug., Oct.**
 - Various Reliability Topics
 - Electric Vehicles, Energy Storage, Large Loads, FERC Order 901– Data and Model Validation
- **State and Provincial Outreach Topics**
 - NERC and NPCC Seasonal Reliability Assessments
 - State of Reliability
 - Interregional Transfer Capability Study (ITCS)
 - FERC Order 901 (September 2025)
- **Regional Webinars/Workshops**
 - Physical and Cyber Security
 - Extreme Weather Preparedness
- **2024 NPCC Northeast Gas-Electric Study**



[NERC Regions Map](#)



IBR Category 2 Registration and Initial Compliance Expectations

Tracy MacNicoll

Senior Entity Risk Assessment Analyst

August 7, 2025



Agenda

- Reliability Gap
- Registration
- Category 2 Reliability Standards
 - Project 2024-01 Rules of Procedure Definitions Alignment
 - Category 2 GO/GOP Standards



The Reliability Gap

ERO Enterprise assessments identified a reliability gap arising due to the increasing penetration of inverter-based resources (IBR) on the grid and the need for updated registration rules under the NERC Rules of Procedure (ROP).

FERC ordered NERC to prepare a work plan to accomplish the above by May 2026.



The Solution



NERC seeks to register Generator Owners (GO) and Generator Operators (GOP) of non-Bulk Electric System IBRs with an aggregate nameplate capacity ≥ 20 MVA connected at a voltage ≥ 60 kV.



Under this proposal, 97.5% of BPS-impactful IBRs would become subject to NERC Reliability Standards, commensurate to the 97% of BPS-impactful synchronous resources currently subject to these standards by nameplate capacity.



Registration



Source: Unsplash



IBR Registration Milestones

NERC is currently in **Phase 3** of the registration milestones identified in the FERC-approved work plan.



Source: [Quick Reference Guide: IBR Registration Initiative](#)



Category 2 Candidate Identification

Request for Information 1
(due September 2024)

- Balancing Authorities
- Transmission Owners

Request for Information 2
(initiated December 2024)

- Registration Candidates

REGIONAL ENTITY	NUMBER OF IBRS	MVA
MRO	118	5,130
NPCC	57	1,862
ReliabilityFirst	77	3,513
SERC	171	9,881
Texas RE	39	1,998
WECC	319	12,800
TOTAL	781	35,184

*The numbers in this table are subject to change based on further validation.

Source: [IBR Registration Workplan May Update_Signed.pdf](#)



NPCC IBR Candidate Expectations

RFI was distributed in December 2024

- Asset Verification Form
- Interconnection Agreement
- Third-Party Operating Agreement

NPCC Registration Outreach

- One-on-One with each Candidate
- Establish Expectations
- Answer Questions



Centralized Organization Registration ERO System (CORES)

- Category 2 expanded existing GO/GOP Functional Registration
- All existing registered GO/GOP should meet the BES Definition
- Modification are in progress to accommodate Category 2
 - Expected: Q3 2025



Standards



Source: Unsplash



Glossary/ROP Alignment

Project 2024-01: Rules of Procedure Definitions Alignment

Generator Owner (GO):

- The entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (Category 2 GO).

Generator Operator (GOP):

- The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resources(s) that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (Category 2 GOP).

Source: [2024-01 GO GOP Definitions_Clean_IB_032425.pdf](#)



Category 2 GO/GOP Standards



Source: [Reliability Standards Compliance Dates for Generation Owners & Generator Operators](#)



Category 2 GO/GOP Standards

Standards that only require FERC approval of GO/GOP Definitions

Reliability Standard	Standards Project # For Inclusion of Cat 2	Status	Effective Date of Standard	Category 2 IBR Compliance Date
BAL-001-TRE	Project 2024-01	Approved	7/1/2020	Pending FERC Approval of GO/GOP Definitions
IRO-010-5	Project 2024-01	Approved	7/1/2025	Pending FERC Approval of GO/GOP Definitions
MOD-032-1	Project 2024-01	Approved	7/1/2015	Pending FERC Approval of GO/GOP Definitions
PRC-012-2	Project 2024-01	Approved	1/1/2021	Pending FERC Approval of GO/GOP Definitions
PRC-017-1	Project 2024-01	Approved	4/1/2017	Pending FERC Approval of GO/GOP Definitions
TOP-003-6.1	Project 2024-01	Approved	7/1/2025	Pending FERC Approval of GO/GOP Definitions
VAR-001-5	Project 2024-01	Approved	1/1/2019	Pending FERC Approval of GO/GOP Definitions
VAR-002-4.1	Project 2024-01	Approved	9/26/2017	Pending FERC Approval of GO/GOP Definitions

Source: [Reliability Standards Compliance Dates for Generation Owners & Generator Operators](#)



Category 2 GO/GOP Standard Modifications

Modifications required for Additional Standards

Reliability Standard	Standards Project # For Inclusion of Cat 2	Status	Effective Date of Standard	Category 2 IBR Compliance Date
PRC-019	-	Requires Modification	-	-
PRC-023	-	Requires Modification	-	-
PRC-024	-	Requires Modification	-	-
PRC-025	-	Requires Modification	-	-
PRC-026	-	Requires Modification	-	-
PRC-027	-	Requires Modification	-	-
PRC-028-1	Project 2021-04	Approved	4/1/2025	7/1/2026
PRC-029-1	Project 2020-02	Pending FERC Approval	Pending FERC Approval	Pending FERC Approval
PRC-030-1	Project 2023-02	Approved	TBD	TBD
TOP-001	-	Requires Modification	-	-
TPL-007	-	Requires Modification	-	-

Source: [Reliability Standards Compliance Dates for Generation Owners & Generator Operators](#)



Resources

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

IBR
REGISTRATION
INITIATIVE

Quick Reference Guide: IBR Registration Initiative

May 2025

As part of its [Inverter-Based Resource Strategy](#), NERC is dedicated to identifying and addressing challenges associated with inverter-based resources (IBR) as the penetration of these resources continues to increase. ERO Enterprise assessments identified a reliability gap associated with the increasing integration of IBRs as part of the grid in which a significant level of bulk power system-connected IBR owners and operators are not yet required to register with NERC or adhere to its Reliability Standards. In response, FERC issued an [order](#) in 2022 directing NERC to identify and register owners and operators of currently unregistered bulk power system-connected IBRs. Working closely with industry and stakeholders, NERC is executing a FERC-approved work plan to achieve the identification and registration directive by 2026.

This visual dashboard allows stakeholders to easily locate key project updates and resource documents and is updated regularly. Resources are also posted on the [Registration page](#) of the NERC website.

IBR Registration Milestones

Phase 1: May 2023–May 2024	Phase 2: May 2024–May 2025	Phase 3: May 2025–May 2026
- Complete Rules of Procedure revisions and approvals - Commence Category 2 GO and GOP candidate outreach and education (e.g., through trade organizations)	- Complete identification of Category 2 GO and GOP candidates - Continue Category 2 GO and GOP candidate outreach and education (e.g., quarterly updates, webinars, workshops, etc.)	- Complete registration of Category 2 GO and GOP candidates thereafter subject to applicable NERC Reliability Standards - Conduct specific Category 2 GO and GOP outreach and education (e.g., quarterly updates, webinars, workshops, etc.)

LEARN MORE ABOUT NERC AND THE E-ISAC

NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

E-ISAC EASTERN INTERCONNECTED SYSTEMS ASSOCIATION

RELIABILITY | RESILIENCE | SECURITY

Key Activities

- NEW** NERC filed its [quarterly work plan progress update](#) with FERC on May 6.
- NEW** NERC updated the [ERO Enterprise event tracking graphic](#).

Available Resources

Learn about the ERO Enterprise and the IBR Registration Initiative: [Open Letter to New Registrants](#) | [101 Resource Document](#) | [IBR Video](#)

Quarterly Updates: [Q1 2024](#) | [Q2 2024](#) | [Q3 2024](#) | [Q4 2024](#) | [Q1 2025](#)

Registration: [ERO Enterprise CMEP Practice Guide](#) | [Quick Reference Guide: Candidate for Registration](#) | [Registration page](#)

Standards: [Reliability Standards Compliance Dates for Generator Owners & Generator Operators](#) | [Milestone 3 Summary and Infographic](#) | [Standards Under Development page](#)

Webinars: November 2024 [Slide Presentation](#) and [Recording](#) | March 2025 [Slide Presentation](#) and [Recording](#)

Currently Available

- Quarterly Updates: [Q2 2025](#)
- Quick Reference Guides and FAQs:
 - [IBR Registration Initiative](#)
 - [IBR Activities](#)
 - [Candidate for Registration](#)
 - [IBR Webinar Series](#)
 - [ERO Enterprise CMEP Practice Guide](#)
 - [Inverter-Based Resources \(IBR\) Registration Initiative—101](#)

Source: [Quick Reference Guide: IBR Registration Initiative](#)



Questions

[Contact Us \(npcc.org\)](http://npcc.org)

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FERC Order 901 Milestones

JP Skeath, Manager, Engineering & Security Integration
August 2025

RELIABILITY | RESILIENCE | SECURITY





STANDARDS MILESTONES: ORDER 901

1

**COMPLETED
JANUARY
2024**

Order No. 901 Work Plan
submission

2

**DUE
NOVEMBER 4,
2024**

Standards development and filing to
address performance requirements
and post-performance validations for
Registered IBRs

3

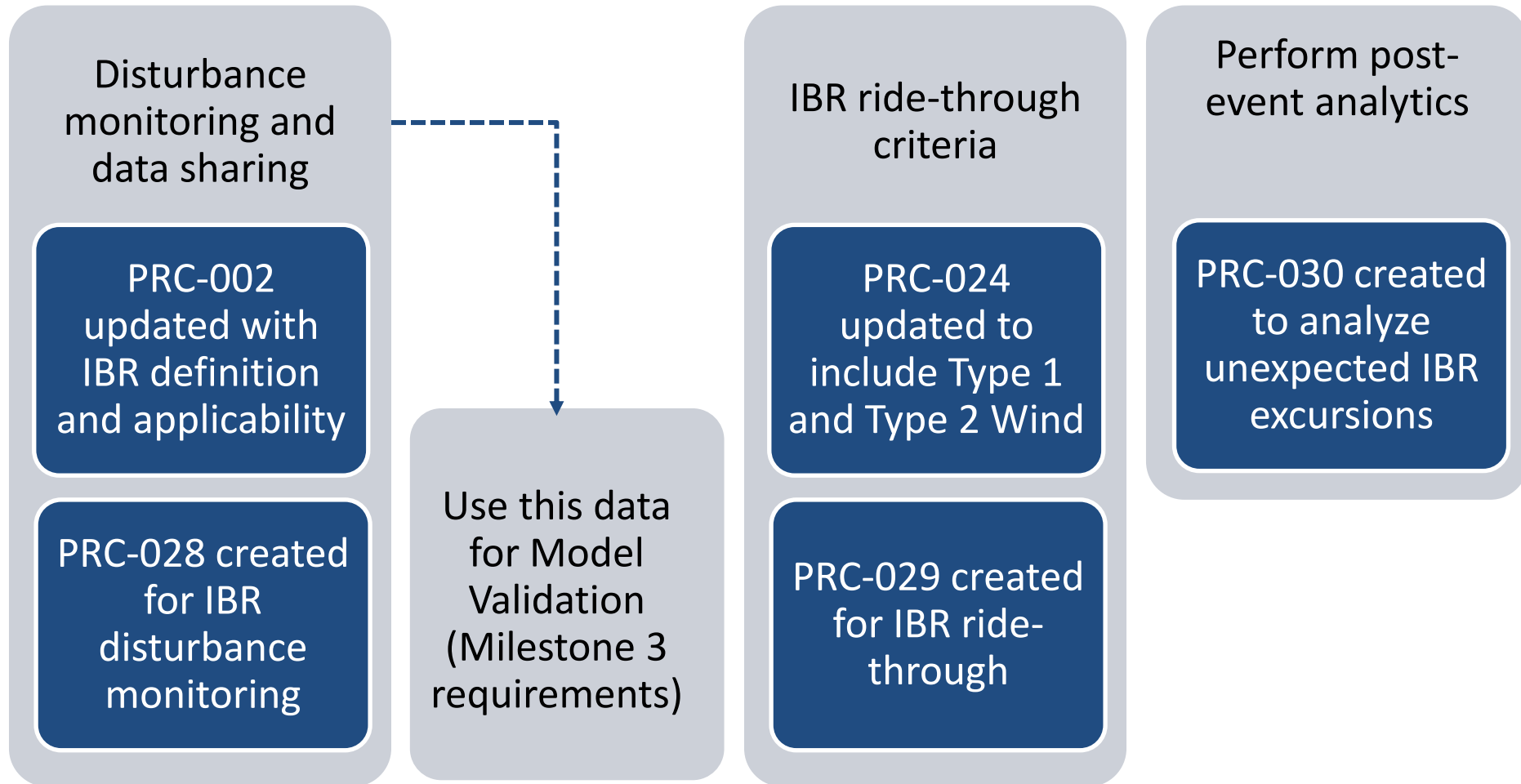
**DUE
NOVEMBER 4,
2025**

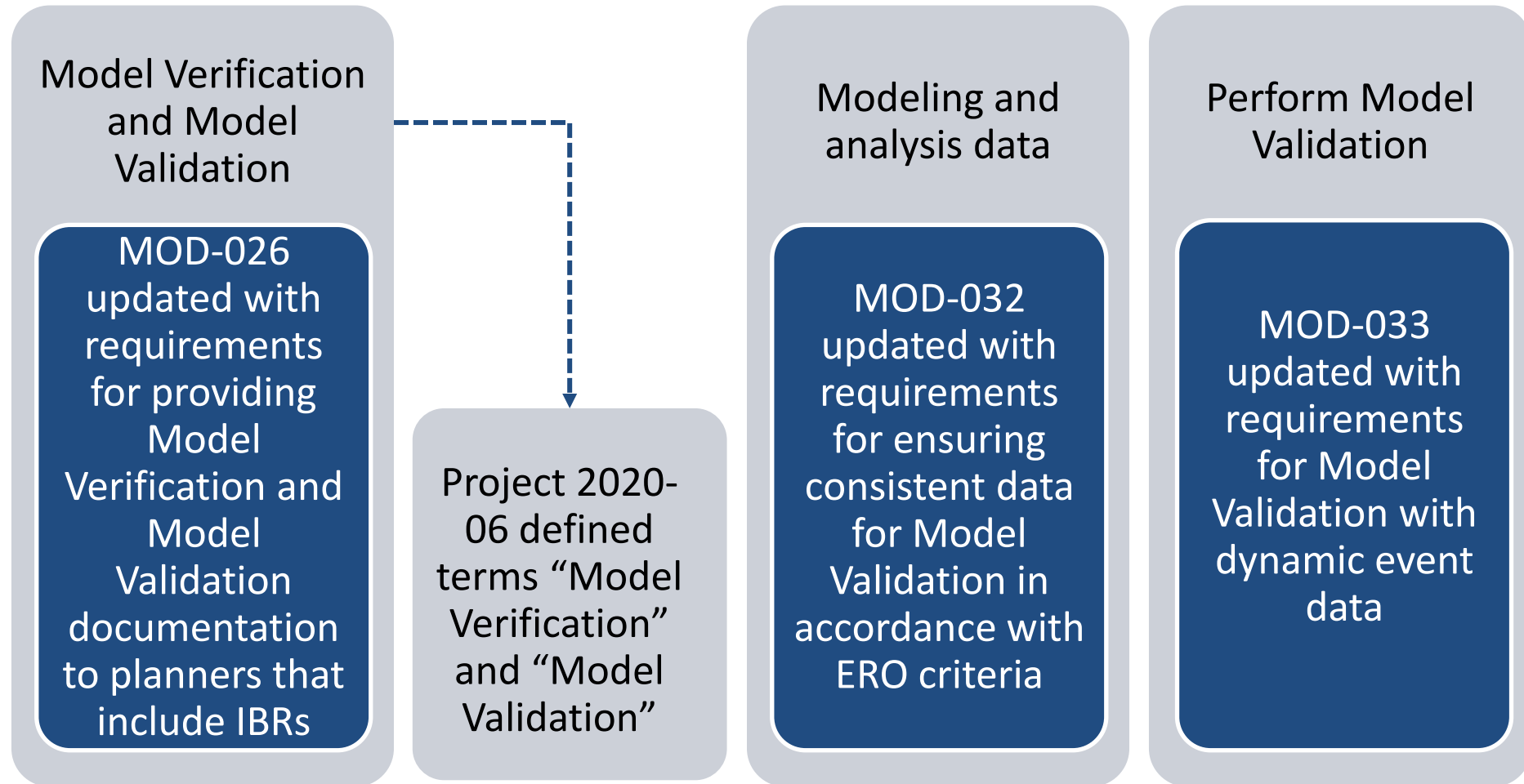
Development and filing of Reliability
Standards to address data sharing
and model validation for all IBRs

4

**DUE
NOVEMBER 4,
2026**

Development and filing of Reliability
Standards to address use of
performance data in Operational and
Planning studies





- All project initial ballots complete.
- Project 2021-01 and Project 2022-02 standards and associated documents to be posted for additional ballot on **August 8**.
- Project 2020-06 to be posted for additional ballot on **August 14**.
- All project ballots to close around second week of September.
- Milestone 3 Standards to be submitted to FERC by **November 4, 2025**.

Purpose:

To establish **consistent modeling data requirements and reporting procedures** for development of planning horizon cases.

Requirement:

Each Planning Coordinator (PC) and its Transmission Planner(s) (TP) develop steady-state, dynamic, and short circuit data requirements:

1.4. Specifications of the following items for dynamic model submissions:

1.4.1. Required submission of:

- standard library models incorporated within the software(s) utilized to create the interconnection-wide case(s);
- user-written models; or
- both standard library models and user-written models.

1.4.2. Where user-written models are accepted, usability requirements for any submitted user-written models including, at a minimum, requirements to provide model documentation and instructions for model set up and use.

1.4.2.1. Each Planning Coordinator and Transmission Planner shall provide their user-written model criteria within 90 calendar days of receiving a written request for such data from other Planning Coordinators and Transmission Planners within the Interconnection.

- FERC Order 901 P104, P105, P106:

Transmission Owners (TO), Distribution Providers (DP), and other registered entities, if they are unable to gather aggregate IBR-DER data, to...

provide instead to the Bulk-Power System planners and operators in their areas: (1) an estimate of the modeling data and parameters of IBR-DERs in the aggregate,²⁰² (2) an explanation of the limitations of the availability of data, (3) an explanation of the limitations of the data provided by IBR-DERs, and (4) the method used for estimation. In support of above, we further direct NERC to consider commenters' suggestions to implement a process or mechanism by which distribution providers would receive modeling data and parameters.²⁰³

- Requirement:

2.1. If ~~the responsible~~ a functional entity, ~~as identified in Requirement R1 Part 1.1,~~ is required to provide data for one or more of the following and is unable to gather ~~unregistered Inverter-based Resource (IBR)¹ data or aggregate Distributed~~ such data and parameters and include, the functional entity shall provide an ~~explanation of the limitations~~ estimate of the ~~availability of~~ data, an explanation of the limitations of ~~any~~ the estimated data ~~provided~~, and the method used for estimation.

- Aggregate DER data; or
- Data for an IBR that is not a DER and does not meet the criteria that would require the owner to register with NERC for mandatory Reliability Standards compliance purposes.

- Attachment 1 contains data reporting requirements to effectively model interconnected transmission system, and typical functional entity responsible for reporting respective data.

<u>steady-state</u> <i>(Items marked with an asterisk indicate data that vary with system operating state or conditions. Those items may have different data provided for different modeling scenarios)</i>	dynamics	short circuit
- Each bus [TO] - nominal voltage - area, zone and owner - Aggregate Demand³ [DP] - real and reactive power* - in-service status* - Generating and storage units⁴ [GO, TO⁵, RP (for future planned resources only)] - real power capabilities - gross maximum and minimum values - reactive power capabilities - maximum and minimum values at real power capabilities in 3a above - station service auxiliary load for normal plant configuration (provide data in the same manner as that required for aggregate Demand under item 2, above). - regulated bus* and voltage set point* (as typically provided by the TOP) - machine MVA base	- Generator [GO, RP (for future planned resources only)] - Excitation System [GO, RP (for future planned resources only)] - Governor [GO, RP (for future planned resources only)] - Power System Stabilizer [GO, RP (for future planned resources only)] - Aggregate Demand³ [DP] - Wind plant model (for plants with type 1 and type 2 wind turbines) [GO] - Inverter-Based Resource [GO, TO⁵] - IBR capabilities related to momentary cessation, tripping, Ride-through, <u>voltage control</u>, and frequency control - Static Var Systems and FACTS [GO, TO, DP] - DC system models [TO] - Aggregate Distributed Energy Resource (DER) data² [DP, TO]⁶	- Provide for all applicable elements in column "<u>steady-state</u>" [GO, RP, TO, DP] - Positive Sequence Data - Negative Sequence Data - Zero Sequence Data - Mutual Line Impedance Data [TO] - Other information requested by the Planning Coordinator or Transmission Planner <u>necessary</u> for modeling purposes. [BA, GO, DP, TO, TSP]

- IRO-010 ensures reliability by preventing instability, uncontrolled separation, or Cascading outages. This is done by ensuring each Reliability Coordinator has data and information to plan, monitor, and assess its area.
- TOP-003 ensures each Transmission Operator (TO) and Balancing Authority (BA) has data and information needed to plan, monitor, and assess its area.
- These standards updated with:
 - Including IBR-specific data and parameters.
 - Clarifying model submission requirements.

1.1. A list of data and information needed by the Reliability Coordinator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and information, external network data and information, Inverter-based Resource (IBR)-specific data and parameters, and identification of the entities responsible for responding to the specification as deemed necessary by the Reliability Coordinator.

1.5.3 Requirements for model submissions to be consistent with the model submitted for planning purposes in accordance with the Criteria for Acceptable Models maintained by the Electric Reliability Organization, as applicable;

Project 2020-06 defined the following terms, which have passed industry ballot:

Model Verification

The process of confirming that model structure and parameter values represent the equipment or facility design and settings by reviewing equipment or facility design and settings documentation.

Model Validation

The process of comparing measurements with simulation results to assess how closely a model's behavior matches the measured behavior.

Purpose:

To verify and validate dynamic models used to assess Bulk Electric System (BES) reliability represent in-service equipment.

- Updated standard will incorporate MOD-027 requirements; MOD-027 will be retired.
- This standards applies to the following facilities
 - Synchronous generators
 - Dynamic reactive resources greater than 20 MVA
 - HVDC systems
 - Inverter-Based Resources

• **I2** – Generating resource(s) including the generator terminals through the high-side of the step-up transformer(s) connected at a voltage of 100 kV or above with:
a) Gross individual nameplate rating greater than 20 MVA. Or,
b) Gross plant/facility aggregate nameplate rating greater than 75 MVA.

• **I5** –Static or dynamic devices (excluding generators) dedicated to supplying or absorbing Reactive Power that are connected at 100 kV or higher, or through a dedicated transformer with a high-side voltage of 100 kV or higher, or through a transformer that is designated in Inclusion I1 unless excluded by application of Exclusion E4

Requirements:

- Each Transmission Planner (TP) and Planning Coordinator (PC) to develop **dynamic model requirements, including those for acceptable Electromagnetic Transient (EMT) models** and provide these to Generator Owner (GO) and Transmission Owner (TO). These requirements will be used to assess acceptability of submitted models. **(Exemptions for legacy GOs)**
- Generator Owner (GO) and Transmission Owner (TO) shall provide this information, including Model Verification and Model Validation information for any new or updated facilities to its Transmission Planner (TP).
- Transmission Planner (TP) shall review, and communicate whether it accepts or declines the dynamic model information. If declined, entities will work together to resolve model issues.

Attachment 1 provides requirements for dynamic models and associated functions

Generator Model	Excitation Control	Governor Control	Additional Limiting and Protective Functions
1. Manufacturer, model number (if available), and type of generator/synchronous condenser; 2. Models representing the generator/synchronous condenser.	1. Manufacturer, model number (if available), and type of excitation system <u>hardware</u>; 2. Model(s) representing the excitation system including voltage regulator, impedance compensation (such as droop, line drop, differential compensation), power system stabilizer, and outer-loop controls which impact dynamic volt/volt-ampere reactive (VAR) performance.	1. Manufacturer, model number (if available), and type of prime mover, governor, and <u>control</u>; 2. Model(s) representing the prime mover, governor control system, and any other controls which impact the dynamic active power or frequency performance due to a system disturbance (e.g., load controller), but excluding Automatic Generation Control.	If required by its Transmission Planner under Requirement R1, Part 1.1.1, Generator Owner(s) or Transmission Owner(s) shall submit: 1. Model(s) representing enabled excitation <u>limiters</u>; 2. Model(s) representing AC over-voltage, AC under-voltage, enabled over-frequency, under-frequency, over-speed, under-speed, Volts per Hertz protective functions, out of step protection that trip the excitation system, the prime mover, or generator/synchronous condenser either directly or via lockout or auxiliary tripping relays.

Purpose:

To establish a process for system model validation to achieve and maintain model accuracy.

Requirement:

- Each Planning Coordinator to validate steady-state and dynamic planning **System model developed in accordance with MOD-032.**
- Validation performed by comparing planning System model to:
 - State estimator case(s) or other Real-time data sources for steady-state models.
 - Actual System behavior obtained from dynamic local event data for dynamic models.
- Planning Coordinator to determine any unacceptable performance differences and resolve these differences.

¹ Such planning System models will thus include registered IBRs and aggregated DERs, as well as IBRs that are not DERs and that do not meet the criteria that would require the owner(s) to register with NERC for mandatory Reliability Standards compliance purposes, that are present in the existing system.

Operational Studies Potential Updates:

- Revise definitions (Real-time Assessment, Operational Planning Analysis, Balancing Contingency Event) to include IBR performance and sudden IBR output reduction.
- TOP Standards:
 - Require entities to utilize IBR performance as captured via updated modeling standards. IBR performance to inform generation-load-interchanges as well as Operating Plans.
- IRO, FAC, PRC Standards:
 - Require Reliability Coordinators to utilize IBR performance information to identify Operating Limit exceedances as well as Transmission and Generation outages.
 - Require Reliability Coordinators to utilize IBR performance information to determine stability limits, Contingency events, and responses to Remedial Action Schemes

Planning Studies Potential Updates:

- Revise TPL-001 Standard or create new Standard to update Planning Models. These updated Planning Models will include IBRs as required in updated Standards from Milestone 3.
- Ensure grid stress performance conditions are updated where necessary.
- Planning assessments to capture IBR performance under these conditions, and to include ride-through performance.

Category	Initial Condition	Event ¹	Fault Type ²	BES Level ³	Interruption of Firm Transmission Service Allowed ⁴	Non-Consequential Load Loss Allowed
P0 No Contingency	Normal System	None	N/A	EHV, HV	No	No
P1 Single Contingency	Normal System	Loss of one of the following: 1. Generator 2. Transmission Circuit 3. Transformer ⁵ 4. Shunt Device ⁶	3Ø	EHV, HV	No ⁹	No ¹²
Table 1 – Steady State & Stability Performance Planning Events Steady State & Stability: - The System shall remain stable. Cascading and uncontrolled islanding shall not occur. - Consequential Load Loss as well as generation loss is acceptable as a consequence of any event excluding P0. - Simulate the removal of all elements that Protection Systems and other controls are expected to automatically disconnect for each event. - Simulate Normal Clearing unless otherwise specified. - Planned System adjustments such as Transmission configuration changes and re-dispatch of generation are allowed if such adjustments are executable within the time duration applicable to the Facility Ratings.			SLG			
			N/A	EHV, HV	No ⁹	No ¹²
			SLG	EHV	No ⁹	No
				HV	Yes	Yes
			SLG	EHV	No ⁹	No
				HV	Yes	Yes
			SLG	EHV, HV	Yes	Yes

- New projects to be developed for Milestone 4 Standards updates.
- Milestone 4 SARs to be posted mid-August for industry comment.
- **Call for nominations** for Milestone 4 Drafting Teams!
- Looking for individuals from utilities, Regions, and vendors with **expertise in planning and operational studies with IBRs**.

- NERC 2020-06 Project Page ([link](#))
- NERC 2021-01 Project Page ([link](#))
- NERC 2022-02 Project Page ([link](#))
- Dynamic Modeling Recommendations ([link](#))
- FERC Order 901 ([link](#))
- Standards Development Work Plan in Response to FERC Order No. 901 ([link](#))
- Project 2022-02 Uniform Modeling Framework for IBR and Project 2021-01 System Model Validation with IBRs Industry Joint Webinar Recording ([link](#))
- Industry Engagement Workshop for Reliable IBR Integration and Milestone 3 of FERC Order 901 Slides and Recording ([link](#))

Announcement

Registration Process for Category 2 Generator Owner and Generator Operator Inverter-Based Resources Webinar Resources Now Available

Click here for: [Slide Presentation](#) | [Webinar Recording](#) | [IBR Initiative Quick Reference Guide](#) | [Candidate for Registration Quick Reference Guide](#) | [Joining the ERO Enterprise](#) | [Expanding Your Registration](#)

On July 14, 2025, NERC hosted an informational webinar on the Registration Process for Category 2 Generator Owner (GO) and Generator Operator (GOP) Inverter-Based Resources (IBRs). This webinar introduced the registration process for owners and operators of non-Bulk Electric System IBRs with aggregate nameplate capacity ≥ 20 MVA connected at a voltage ≥ 60 kV that are required to register with NERC and adhere to its Reliability Standards. NERC has developed a process to register these Category 2 GOs and GOPs by May 15, 2026.

The informational webinar was designed to focus on the registration process for Category 2 GOs and GOPs, including the new functionality in the Centralized Organization and Registration ERO System (CORES), and included an update on the IBR Initiative Milestones and Resources, and an overview of the [Electricity Information Sharing Analysis Center](#) (E-ISAC).

The webinar agenda included:

- IBR Initiative Milestones and Work Plan Overview
- E-ISAC Overview
- Registration Process
- Centralized Organization Registration ERO System (CORES)
- Question and Answers

NERC also released new infographics to support entities in IBR Registration Initiative. For newly identified entities, the [Joining the ERO Enterprise](#) infographic provides background on the ERO Enterprise and its mission and provides a step-by-step overview of the registration process. For currently registered entities, the [Expanding Your Registration](#) infographic explains how to update existing registrations in CORES to reflect new Category 2 Generator Owner/Generator Operator responsibilities.

These resources are part of a broader effort to welcome new participants into the ERO Enterprise and provide the tools and guidance needed to support reliability and compliance from the start.

A map of North America, including the United States, Canada, and Mexico, is shown in a light blue-grey color. A horizontal bar with a blue-to-white gradient is superimposed over the center of the map, passing through the United States. The text "Questions and Answers" is written in bold black font on this bar.

Questions and Answers

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Modernization of Standards Processes and Procedures (MSPP) Task Force

Brett Kruse

Todd Lucas

NPCC

August 7, 2025

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Transform and Modernize the Process

Re-envision a modernized standard development process to address evolving risks.

Create Efficiencies

Identify areas of opportunity and recommendations to save time and remove redundant steps in the current process.

Develop a Trusted Process

Provide clear opportunities for stakeholder input, due process, openness, and balance of interests.

March



**Stood Up
Task
Force**

April



**April
Workshop**

May - June



**Industry
Feedback
Survey**

May - July



**Opportunities
Developed**

June



**June
Workshop**

July



**White
Paper
Posted for
Comment**



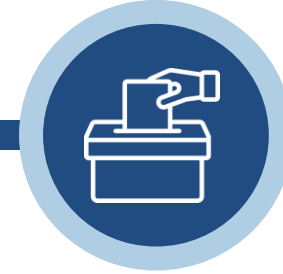
Standards Initiation

- Implement a biannual review and prioritization process
- Centralize the process through the Reliability and Security Technical Committee



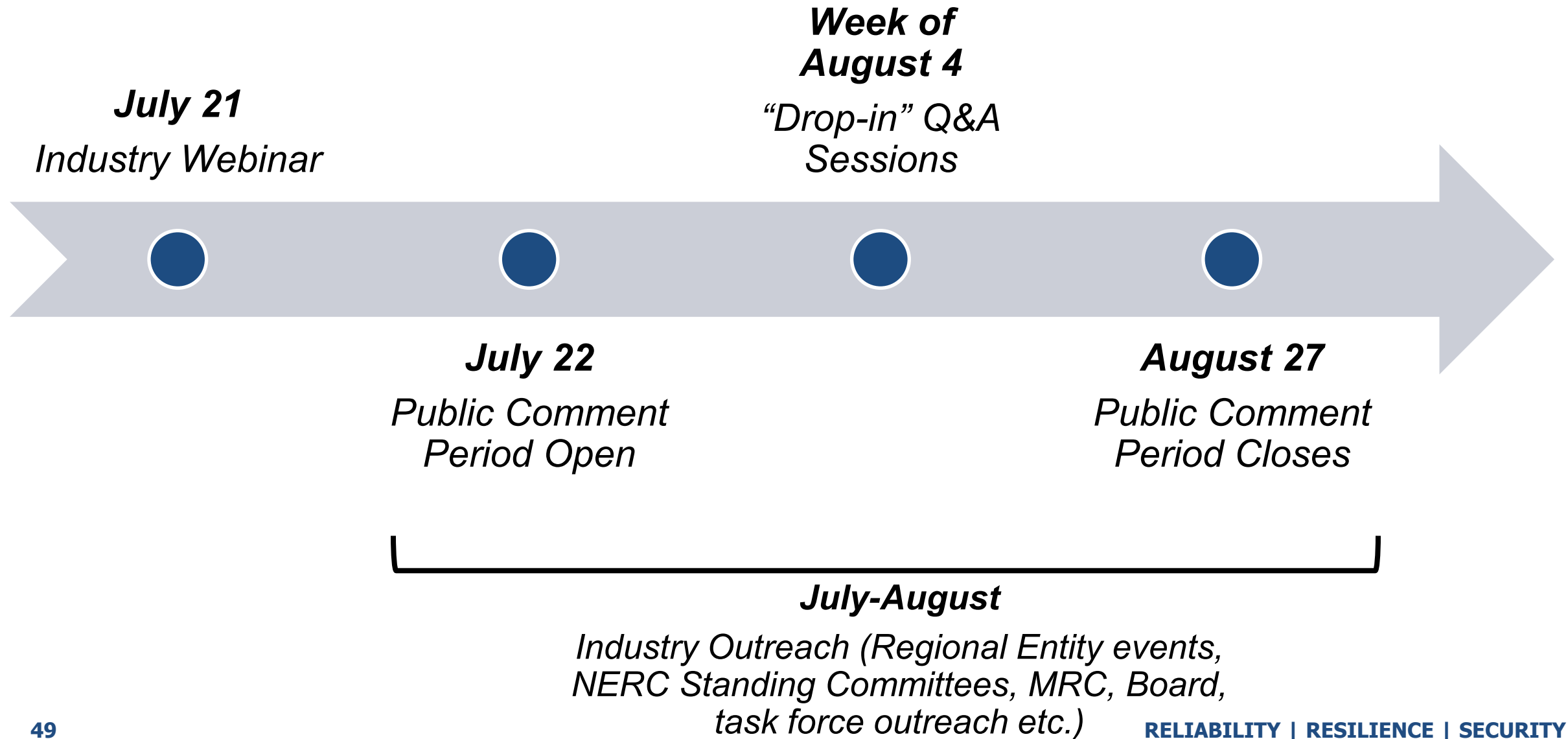
Standards Development

- Form a new group or panel to coordinate standards drafting with AI assistance
- Outsource standards drafting
- Implement incremental process changes



Balloting

- Create a standing ballot body
- Implement a notice and comment process for proposed standards
- Implement incremental changes to Registered Ballot Body framework



Q2 2025

- Developed scope document
- Identified areas for improvement
- Solicit stakeholder input

Q3 2025

- Develop white paper of potential improvement opportunities
- Solicit stakeholder input
- Develop draft recommendations

Q4 2025

- Solicit stakeholder input
- Finalize recommendations

Q1 2026

- Present recommendations to NERC Board

Communications and Engagement

- Individual task force engagement
- General communications to and broad engagement with industry and stakeholders
- Updates to NERC's Board, MRC, Standing Committees, and Industry Groups

- Resources and forthcoming engagements are posted on the [MSPPTF webpage](#) (under the Initiatives tab [NERC homepage](#)).
- Link to the whitepaper [Standard Process Improvements White Paper](#) and the feedback form [MSPPTF Potential Improvement Opportunities Industry Feedback Questionnaire](#)
- Several resources are available to keep industry and stakeholders informed throughout this critical project:
 - [MSPP FAQs](#)
 - [MSPPTF External Engagements](#)
- The MSPPTF publishes a monthly update at the beginning of each month to provide an overview of recent activity and upcoming work.

Monthly Update

MSPPTF Modernization of Standards Processes & Procedures

The speed at which risks to the reliability, security, and resilience of the bulk power system are emerging during the transformation to a decentralized, digitized, and decarbonized grid is outpacing industry's ability to develop, enhance, and implement Reliability Standards under the existing processes and procedures. At its February 2025 meeting, the NERC Board of Trustees passed a resolution forming an industry-led Modernization of Standards Processes and Procedures Task Force (MSPPTF) to undertake a strategic review of NERC's Reliability Standards development process. The task force will present proposed recommendations to the NERC Board in February 2026.

2025 June Update
This is the second in a series of updates that summarize ongoing activities related to the MSPPTF initiative.

Background
The MSPPTF is focusing on transforming current processes and procedures to ensure that standards can be developed more efficiently and effectively to better address the complex and rapidly evolving risk landscape. It is considering the spectrum of the current standards program, including processes, balloting, drafting, and the roles of team and committee members. The MSPPTF is also reviewing prior standard improvement efforts and recent Section 321 actions for lessons learned.

Key Activities
Since the last update, the MSPPTF has identified and prioritized three areas of opportunity for improvement in the standards process and is conducting a deep dive into: 1) standards initiation/standard authorization requests, 2) standards development/drafting, and 3) balloting. The task force is meeting this month to develop an initial outline of recommended changes.

Stakeholder Outreach
The MSPPTF also released a [survey](#) that provides stakeholders with the opportunity to offer ideas for consideration to transform current standards processes and procedures. The survey (which is due on June 5) is anonymous, and while the task force will not directly respond to comments, survey feedback will be considered as the initial outline of recommended changes is developed. The initial outline will be posted this summer for additional stakeholder input.

Key Resources
Several resources are available to keep industry and stakeholders informed throughout this critical project, including the [MSPPTF webpage](#) (located under the Initiatives tab on the [NERC homepage](#)), the [MSPPTF Scope](#), the [MSPPTF Roster](#), and [MSPPTF FAQs](#).

Questions? Please email mpp@nerc.net.

Timeline:

Q2 2025	Q3 2025	Q4 2025	Q1 2026
Developed scope document	Developed strawman draft of recommendations	Solicit stakeholder input	Present recommendations to NERC Board
Identified areas for improvement	Solicit stakeholder input	Finalize recommendations	
Solicit stakeholder input	Refine draft recommendations		

Communications and Engagement

- Individual task force engagement
- General communications to and broad engagement with industry and stakeholders
- Updates to NERC's Board, MRC, Standing Committees, and Industry Groups



Questions and Answers

Questions?

Email mspp@nerc.net



BREAK

Resume at 10:55 AM



NERC Milestone 3 Updates

IBR Modeling, Model Verification, and Model Validation

Ryan D. Quint, PhD, PE

President and CEO, Elevate Energy Consulting

President and Chief Engineer, GridStrong

August 2025

The Elevate Team



Disclaimers

- These views reflect the insights of Elevate and do not necessarily reflect the views of our partners and clients.
- These views reflect learnings from working on *many* IBR plant models across multiple Regions and entities, and do not reflect any one site or entity.
- These views should not be interpreted as compliance advice; they are solely for the purpose of discussion and *elevating* industry.

NERC Activities

Order 901 Milestone 3 Updates and Related Efforts

NERC Dynamic Modeling Recommendations

- Detailed and accurate modeling
- Reflecting as-left facility settings
- Comprehensive IBR modeling req's
- Adequate proof of conformance
- Positive sequence library model
- Positive sequence user-defined model (UDM)
- Electromagnetic transient (EMT) model
- Site-specific models, verified by OEM
- Benchmarking across models
- List of unacceptable models

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Dynamic Modeling Recommendations

Recommended Modeling Practices and List of Unacceptable Models

Primary Interest Groups
This document applies to Transmission Planners (TP), Planning Coordinators (PC), and MOD-032 designees. The recommendations are also relevant to Generator Owners (GO), original equipment manufacturers (OEM), consultants, and any other organization performing bulk power system (BPS) reliability studies.

Scope and Intended Use
This document replaces the NERC Acceptable Model List, which has historically been used to establish requirements and criteria for the creation of interconnection-wide base cases by MOD-032 designees. The intent of this paper is to provide clear and more comprehensive recommendations regarding the use of dynamic models for different types of reliability studies. This paper particularly focuses on models used for dynamic stability analyses but does incorporate recommendations for other types of studies as well. MOD-032 designees shall incorporate the recommendations contained herein for their interconnection-wide case creation processes; TPs and PCs are strongly encouraged to review and incorporate these recommendations in their modeling and study processes.

Recommended Dynamic Modeling Practices
NERC strongly recommends the following framework for dynamic models used in BPS reliability studies:

- All models should be detailed and accurate representations of expected or as-built facilities on the BPS, including during interconnection studies and throughout the lifecycle of a project.
- It is the responsibility of each TP and PC to establish clear, consistent, sufficiently detailed, and comprehensive modeling requirements. These requirements should include model quality checks and updates when needed.
- It is the responsibility of each project developer and GO to meet the modeling requirements established by the TP and PC and to provide adequate proof of conformance to the requirements. It is the responsibility of each GO to maintain an accurate model throughout the lifecycle of the project. GOs shall notify the TP and PC of any expected changes or updates (per NERC FAC-002) for in-service equipment and submit updated models accordingly.
- All TPs and PCs should require all of the following for each generator connected (or seeking interconnection) to the BPS to ensure that sufficient models and supporting documentation are provided:
 - A positive sequence library model that is on the list of unacceptable models found in [Appendix A](#) should not be provided. This model is often used by the MOD-032 designee for interconnection-wide base case creation, and it is often used in studies to represent facilities outside of the TP/PC study area.

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Order 901 Milestone 3 Standards Projects

FERC Order 901 Milestone 3 Projects

Project 2020-06 – Verifications of Models and Data for Generators: Addressing the verification and validation of models for registered inverter-based resources (IBR), unregistered and aggregated IBR, and aggregated distributed energy resources.

Additional Focus:

- Define terms, such as Model Verification and Model Validation
- Develop process for post-interconnection model validation based on performance data
- Set validation expectations using performance data

Standards Include: MOD-026, MOD-027

Project 2021-01 – System Model Validation with IBRs: Addressing system-level model verification and validation against actual system operational behavior during disturbances as well as aligning steady state and dynamic representation, where appropriate.

Additional Focus:

- Develop criteria for performing validation
- Determine minimum study conditions for conducting validation studies
- Develop process to communicate system interconnection-wide model defects to Transmission Planners and other associated entities

Standards Include: MOD-033

Project 2022-02 – Uniform Framework Model Framework for IBR: Addressing development of a NERC-maintained library consisting of generic IBR model types.

Additional Focus:

- Establish a uniform framework for data sharing and model development
- Ensure other standards use performance data and library using this framework

Standards Include: MOD-032, TOP-003, IRO-010

Order 901 Milestone 3 Standards Projects

Project 2020-06	Verifications of Models and Data for Generators
<i>MOD-026</i> <i>MOD-027</i>	• Combining MOD-026-1 and MOD-027-1 • Created NERC definitions for IBR, Model Verification, and Model Validation • Addresses registered IBRs and synchronous generators • Adds EMT modeling requirements (commissioned IBRs after effective date; TPs identify legacy assets) • GO/TO conduct model verification, model benchmarking • Validation of models with actual disturbance monitoring data from PRC-002 and PRC-028
Project 2022-02	Uniform Framework Model for IBRs
<i>MOD-032</i> <i>TOP-003</i> <i>IRO-010</i>	• ERO-approved criteria for acceptable models; uniform model framework for data sharing and model development • Developed DER definition • MOD-032: replace LSE with DP, ERO criteria for acceptable models, includes unregistered IBR and DER data exchange, modifications to Attachment 1 • TOP-003 and IRO-010: IBR-specific data and parameters, acceptable models,
Project 2021-01	System Model Validation with IBRs
<i>MOD-033</i>	• Not a lot of MOD-033 requirements changing • Enhancing guidance, technical rationale, etc., for the “how” • Incorporates data sources from PRC-002 and PRC-028 for real-time data access

Milestone 3 Initial Ballots

Initial Ballots for NERC Milestone 3 Standards Projects

Project	Standard	Standard Ballot Results	Implementation Plan Ballot Results
Project 2020-06	MOD-026-2	32.47% (<i>Fail</i>)	40.22% (<i>Fail</i>)
Project 2021-01	MOD-033-2	57.06% (<i>Fail</i>)	59.43% (<i>Fail</i>)
Project 2022-02	MOD-032-2	39.05% (<i>Fail</i>)	39.46% (<i>Fail</i>)
	IRO-010-6	41.62% (<i>Fail</i>)	
	TOP-003-8	34.70% (<i>Fail</i>)	

- Initial ballots failed (not uncommon)
- Drafting teams currently working on subsequent revisions
- November deadline approaching – will NERC ROP 321 process be needed?

Model Verification and Validation Definitions

Model Verification: The process of confirming that model structure and parameter values are representative of the equipment or facility design and settings by reviewing equipment or facility design and settings documentation.

Model Validation: The process of comparing simulation results with measurements to assess how closely a model's behavior matches the measured behavior.

NERC IRPS SAR: FAC-001 and FAC-002

- SAR endorsed by NERC RSTC
- Approved by NERC SC and assigned to EMT project
- “Medium Priority” project
- Modify FAC-001 and FAC-002 for IBR Risks
 - Enhancements to interconnection requirements (*TOs*)
 - IBR conformity assessments via studies (*TPs and PCs*)
 - IBR facility commissioning requirements (*GOs*)

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Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information		
SAR Title:	Revisions to FAC-001-4 and FAC-002-4	
Date Submitted:	7/2024	
SAR Requester		
Name:	Julia Matevosyan, ESIG (NERC IRPS Chair) Rajat Majumder, Invenenergy (NERC IRPS Vice Chair)	
Organization:	NERC Inverter-Based Resource Performance Subcommittee (IRPS)	
Telephone:	Julia – 512-994-7917 Rajat –	Email: julia@esig.energy RMajumder@invenenergy.com
SAR Type (Check as many as apply)		
☐ New Standard	☐ Imminent Action/ Confidential Issue (SPM Section 10)	
☒ Revision to Existing Standard	☐ Variance development or revision	
☐ Add, Modify or Retire a Glossary Term	☐ Other (Please specify)	
☐ Withdraw/retire an Existing Standard		
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)		
☐ Regulatory Initiation	☒ NERC Standing Committee Identified	
☐ Emerging Risk (Reliability Issues Steering Committee) Identified	☐ Enhanced Periodic Review Initiated	
☐ Reliability Standard Development Plan	☒ Industry Stakeholder Identified	
What is the risk to the Bulk Electric System (BES) reliability benefit does the proposed project provide?:		
The bulk power system (BPS) in North America is undergoing a rapid transformation towards high penetrations of inverter-based resources. This grid transformation adds significant complexity and a changing risk landscape that require IBR-specific standards requirements. Recent NERC disturbance reports such as San Fernando, Odessa I and II, Southwest Utah, etc. ¹ as well as the November 2023 NERC Inverter-Based Resource (IBR) Performance Issues Report Findings from Level 2 Alert ² strongly point toward:		

¹ <https://www.nerc.com/pa/rm/ea/Pages/Major-Event-Reports.aspx>

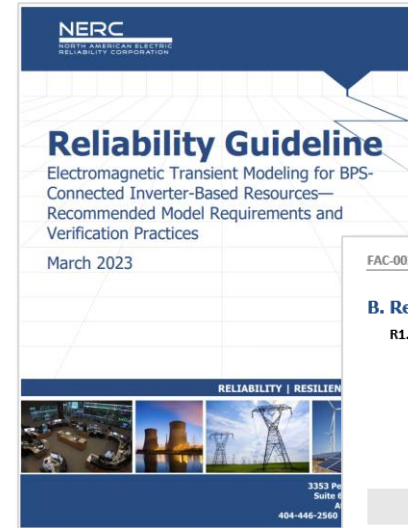
² https://www.nerc.com/comm/RSTC_Reliability_Guidelines/NERC_Inverter-Based_Resource_Performance_Issues_Public_Report_2023.pdf

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NERC Project 2022-04 EMT Modeling

- Modifying **NERC FAC-002, MOD-032,** and **TPL-001** to include EMT modeling and study requirements
- FAC-002 revisions underway
 - EMT model requirements
 - Process for collecting models, independent of studies
 - EMT model review process
 - Process for determining if EMT studies are needed (“screening”)



FAC-002-45 – Facility Interconnection Studies

B. Requirements and Measures

R1. Each Transmission Planner (TP) and each Planning Coordinator (PC) shall jointly study the reliability impact of: (i) interconnecting new generation, transmission, or electricity end-user Facilities and (ii) existing interconnections of generation, transmission, or electricity end-user Facilities seeking to make a qualified change as defined by the Planning Coordinator under Requirement R6. Each Transmission Planner and Planning Coordinator shall jointly study the following shall be studied: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

1.1. Specify steady-state, short-circuit, dynamics, and electromagnetic transient (EMT) modeling requirements, as applicable, for generation, transmission, and electricity end-user Facilities.

1.1.1. a documented process for collecting models, and
1.1.2. documentation needed to support model review per Requirement R7.

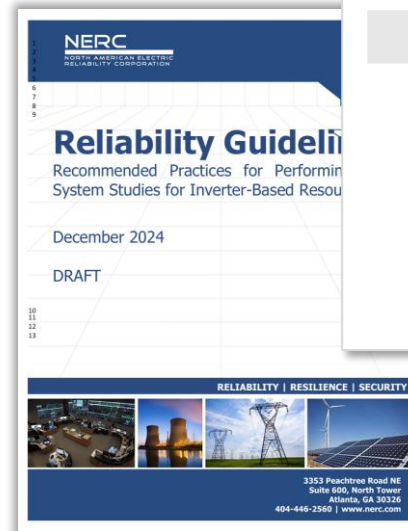
1.2. Establish processes to determine the necessity of steady-state, short-circuit, dynamics, and EMT studies for evaluating the reliability impact of the new interconnection, or existing interconnection seeking to make a qualified change as defined by the Planning Coordinator under Requirement R6.

1.2.1.3. Evaluate the reliability impact of the new interconnection, or existing interconnection seeking to make a qualified change as defined by the Planning Coordinator under Requirement R6, on affected system(s);

1.2.1.4. Evaluate adherence to applicable NERC Reliability Standards; regional and the Transmission Owner planning criteria; and Facility interconnection requirements for coordinated studies;

1.3.1.5. Perform steady-state, short-circuit, and dynamics studies, utilizing phasor domain and/or electromagnetic transient (EMT) simulation tools as necessary per TP's and PC's defined processes, to evaluate system performance under both normal and contingency conditions; and

1.4.1.6. Document study assumptions, system performance, alternatives considered, and coordinated recommendations. While these studies may be performed independently, the results shall be evaluated and coordinated by the entities involved.



Modeling-Related Alerts and Reports

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Industry Recommendation

Inverter-Based Resource Model Quality Deficiencies

Initial Distribution: June 4, 2024

NERC has analyzed 10 large-scale disturbances on the bulk power system (BPS) that involved the widespread and unexpected reduction in output of inverter-based resources (IBR) since 2016. These 10 disturbances totaled nearly 15,000 MW of unexpected IBR output reduction with approximately 10,000 MW occurring between 2020 and 2024. The increase of IBR-related events coincides with an increase in IBR penetration across the BPS. Two contributing causes to these events are poor modeling and study practices to assess the performance of these resources.

Performing dynamic simulations of the BPS allows Transmission Planners (TP), in cooperation with Generator Owners (GO), to mitigate reliability risks before they occur. Accurate dynamic models of resources are critical to this analysis and to BPS reliability. Several of NERC's published disturbance reports included analyses of the models for the affected facilities, which revealed systemic dynamic model inaccuracies. These analyses also revealed that the models provided for conducting generator interconnection studies or other system studies failed to accurately reflect the dynamic performance of the plants. Accurate modeling of IBR facilities is critical in performing system studies to assess the reliable operation of the BPS.

This alert is being distributed to all GOs of Bulk Electric System (BES)-connected IBRs as modeling deficiencies, best practices, and recommendations are applicable across all IBR technologies. NERC encourages owners and operators of non-BES and BPS-connected IBRs to review this alert as well.

The significantly higher complexity and software-based nature of IBR modeling when compared to synchronous machine modeling necessitates an improvement in the fundamental principles of dynamic modeling to accurately capture the performance of IBR plants. This alert is also being distributed to TPs and Planning Coordinators (PC) to provide recommendations that can be implemented to strengthen current modeling practices. TPs and PCs are required to answer a set of questions in the alert system; however, only GOs of IBRs will need to complete the Data Submission Worksheet.

This alert will gather dynamic modeling information from BES-connected IBR GOs, TPs, and PCs to understand the extent of condition of dynamic modeling for IBR, which will inform what additional actions are necessary to mitigate observed deficiencies. These GOs are strongly encouraged to coordinate with their inverter- and plant-level controller manufacturers and third-party consultants to review the parameters and controls installed in the field, review and mitigate modeling deficiencies, and implement the recommendations described in this alert. The information gathered throughout this alert should also be shared and reviewed with the associated GOPs as applicable.

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Level 2 Alert on IBR Model Quality
Deficiencies (June 2024)

[here](#)

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Aggregated Report on NERC Level 2
Recommendation to Industry:

Findings from Inverter-Based Resource Model Quality Deficiencies Alert

April 1, 2025

Overview

NERC issued a Level 2 Recommendation to Industry for Inverter-Based Resource Model Quality Deficiencies in June 2024, specifically requesting responses from Generator Owners (GO), Transmission Planners (TP), and Planning Coordinators (PC). The alert was posted publicly on the NERC website and required GOs who own bulk power system (BPS)-connected inverter-based resources (IBR) to provide a Data Submission Worksheet, (hereafter: "Worksheet"). The alert had an initial Worksheet submission deadline of September 2, 2024, and due to a low response rate, NERC extended the deadline to November 1, 2024. This resulted in NERC receiving sufficient responses to perform an analysis.

Based on the findings from this alert and the previous alert on IBR performance, a Level 3 alert with Essential Actions is needed to address the deficiencies identified in this Level 2 Alert.

Summary

NERC analyzed 10 large-scale disturbances on the BPS that involved the widespread and unexpected reduction in output of IBRs since 2016. These 10 disturbances totaled nearly 15,000 MW of unexpected IBR-output reduction, with approximately 10,000 MW of reduction occurring from disturbances between 2020 and 2024. The increase of IBR-related events coincides with an increase in IBR penetration across the BPS. Contributing causes to these events are poor modeling and poor study practices to assess the performance of these resources.

Performing dynamic simulations of the BPS enables TPs, in cooperation with GOs, to mitigate reliability risks before they occur. Accurate dynamic models of resources are critical to this analysis and to BPS reliability. Several of NERC's published disturbance reports included analyses of the models for the affected facilities, which revealed systemic dynamic model inaccuracies. These analyses also revealed that the models provided for conducting generator interconnection studies, or other system studies, failed to accurately reflect the dynamic performance of the plants. Accurate modeling of IBR facilities is critical in performing system studies to assess the reliable operation of the BPS.

The Inverter-Based Resource Model Quality Deficiencies Alert was distributed to all registered GOs of IBRs as modeling deficiencies, best practices, and recommendations are applicable across all IBR technologies. NERC encourages owners and operators of non-BES and BPS-connected IBR to also review the alert.

The significantly higher complexity and software-based nature of IBR modeling, when compared to synchronous machine modeling, necessitates an improvement in the fundamental principles of dynamic modeling to accurately capture the performance of IBR plants. This alert was also distributed to TPs and

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Report on Level 2 Alert on IBR Model
Quality Deficiencies (April 2025)

[here](#)

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Essential Actions to Industry

Inverter-Based Resource Performance and Modeling

Initial Distribution: May 20, 2025

NERC is issuing this Level 3 Alert: *Essential Actions for Inverter-Based Resource (IBR)¹ Performance and Modeling to Transmission Owners (TO), Transmission Planners (TP), Planning Coordinators (PC), and currently registered Generator Owners (GO) to enhance technical minimum requirements and study processes to mitigate risks posed by IBR performance during system disturbances.*

Since 2016, NERC has analyzed numerous major events totaling more than 15,000 MW of unexpected generation reduction. These major events were not predicted through current planning processes. Furthermore, NERC studies were not able to replicate the system and resource behavior that occurred during the events, indicating systemic deficiencies in industry's ability to accurately represent the performance of IBRs and study the effects of IBR on the bulk power system (BPS).

In response to these disturbances, NERC has issued 10 major event reports and four Level 2 Alerts. The *Level 2 Alert: IBR Performance Issues²* findings report contains the following critical findings:

- (i) The voluntary recommendations set forth in NERC guidelines and other publications are not being implemented by GOs.
- (ii) Many GOs indicated that they did not have the requested facility data readily available.
 - a. The information requested in the worksheet is fundamental equipment information that NERC expects would be retained and easily accessible with some assistance from equipment manufacturers, if necessary.

Assessment of the data received and feedback from entities during the *Level 2 Alert: IBR Model Quality Deficiencies³* provided additional evidence of the critical findings above. NERC issued its second-ever deadline extension for this alert due to numerous questions and comments received that indicated the requested data was still not readily available, resulting in another extremely low data submission worksheet submittal rate.

The information provided in response to this alert will also be of use to the potential Standards Drafting Team (SDT) working on the Reliability Standard FAC-001 and FAC-002 Standard Authorization Request sent by the Reliability and Security Technical Committee (RSTC) to the Standards Committee (SC). NERC anticipates that the data obtained will support effective and efficient review of the modeling issues by any SDT.

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Level 3 Alert on IBR Performance and
Modeling (May 2025)

[here](#)

¹ Inverter-Based Resource (IBR): A plant/facility consisting of individual devices that are capable of exporting Real Power through power electronic interface(s), such as an inverter or converter, and that are operated together as a single resource at a common point of interconnection to the electric system. Examples include, but are not limited to, plants/facilities with solar photovoltaic (PV), Type 3 and Type 4 wind, battery energy storage system (BESS), and fuel cell devices.

² <https://www.nerc.com/pa/rtrm/Docs/Alerts%20to%20IBR%20Alert%20Level%202%20-%20IBR%20Performance%20Issues%20-%202024.pdf>

³ <https://www.nerc.com/pa/rtrm/Docs/Alerts%20to%20IBR%20Alert%20Level%202%20-%20IBR%20Performance%20Issues%20-%202024.pdf>

Level 2 Alert Recommendations

- Models should be accurate, detailed, and represent or expected or as-built facilities.
- Industry-approved standard library positive sequence models are sufficient for use in Interconnection-wide base case creation.
- Equipment-specific, user-defined models should be used for detailed reliability studies (e.g., interconnection studies, local reliability studies); should be accepted by TP or PC if usability requirements are met.
- TPs and PCs should establish clear, consistent, detailed, and comprehensive modeling requirements aligned with NERC recommendations and FERC GIP; include model quality check.
- TPs and PCs should require standard library model, equipment-specific UDM, electromagnetic transient (EMT) model, and supporting documentation from each generator.
- GOs should coordinate with inverter and PPC manufacturers, TPs, and PCs to meet model requirements; provide proof of conformance with requirements.
- GOs should maintain an accurate and representative model throughout the lifecycle of the project.
- An updated set of dynamic models should be included in the next TP and PC annual model updates.

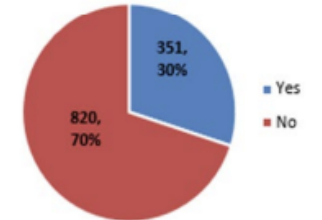
NERC Report on Model Deficiencies (April 2025)

Down Droop Gain (DDN)			
Data Source	GO Field Manual Entry	GO Model Manual Entry	GO Model Dynamic Model File
GO Model Manual Entry	44%		
GO Model Dynamic Model File	40%	69%	
Interconnection-Wide Model Dynamic Model File	30%	31%	45%

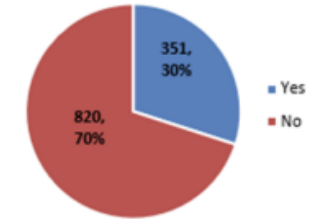
Low Voltage Ride-through Enter (Vdip)			
Data Source	GO Field Manual Entry	GO Model Manual Entry	GO Model Dynamic Model File
GO Model Manual Entry	35%		
GO Model Dynamic Model File	38%	93%	
Interconnection-Wide Model Dynamic Model File	27%	67%	69%

[Source: NERC Report](#)

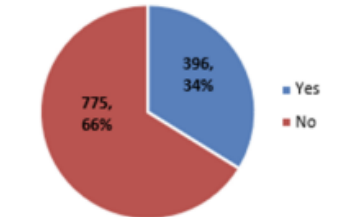
LVRT Settings at Max Capability	# of Facilities	%
Yes	351	30%
No	820	70%
Total	1,171	100%



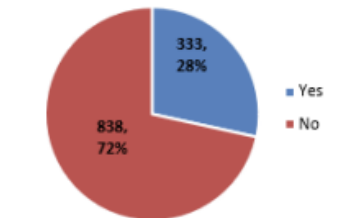
Overvoltage Settings at Max Capability	# of Facilities	%
Yes	351	30%
No	820	70%
Total	1,171	100%



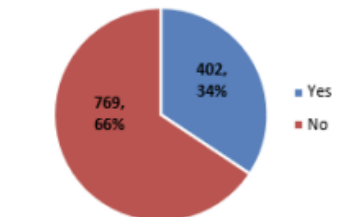
Undervoltage Settings at Max Capability	# of Facilities	%
Yes	396	34%
No	775	66%
Total	1,171	100%



HFRT Settings at Max Capability	# of Facilities	%
Yes	409	35%
No	762	65%
Total	1,171	100%



LFRT Settings at Max Capability	# of Facilities	%
Yes	402	34%
No	769	66%
Total	1,171	100%



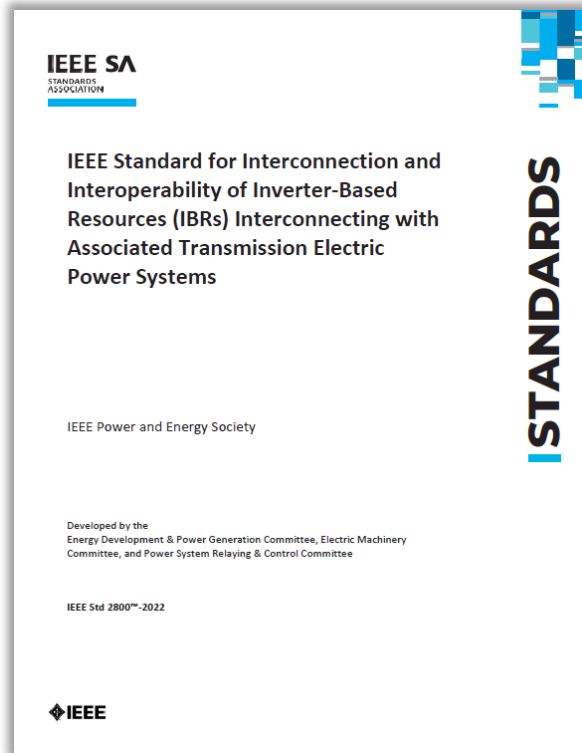
Level 2 Alert Key Findings from NERC

- GOs indicated that requested data was **not** readily available
- NERC expressed concerns with “lack of knowledge” of IBR plant setup and operating characteristics and “failure to improve data acquisition and management processes”
- Systemic deficiencies indicate insufficient interconnection requirements are insufficient
- Protection settings not maximized to inverter capability
- Limitations of reactive power capability
- Inconsistent data across sources – as-left settings, reported data, submitted models, interconnection-wide base cases
- Recommendations
 - TPs and PCs should enhance model requirements and quality check processes to mitigate deficiencies
 - Level 3 Alert on IBR performance and modeling

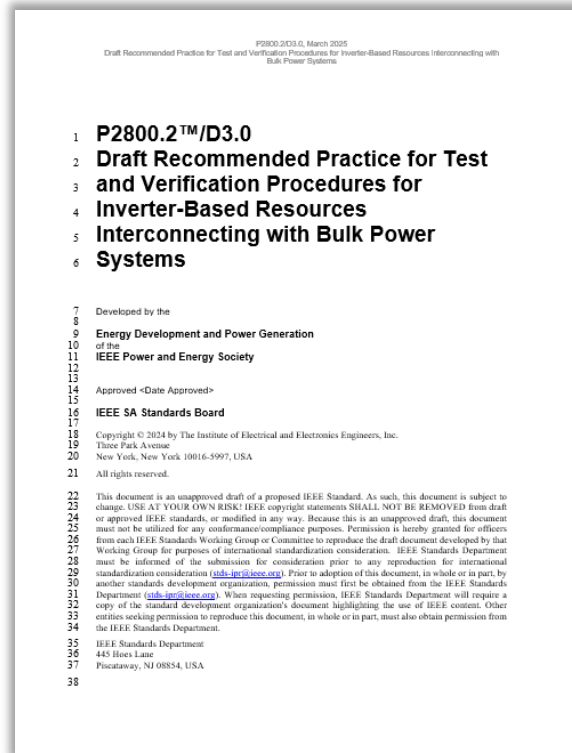
-
- NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION
- ## Essential Actions to Industry
- ### Inverter-Based Resource Performance and Modeling
- Initial Distribution: May 20, 2025
- NERC is issuing this Level 3 Alert: *Essential Actions for Inverter-Based Resource (IBR)¹ Performance and Modeling* to Transmission Owners (TO), Transmission Planners (TP), Planning Coordinators (PC), and currently registered Generator Owners (GO) to enhance technical minimum requirements and study processes to mitigate risks posed by IBR performance during system disturbances.
- Since 2016, NERC has analyzed numerous major events totaling more than 15,000 MW of unexpected generation reduction. These major events were not predicted through current planning processes. Furthermore, NERC studies were not able to replicate the system and resource behavior that occurred during the events, indicating systemic deficiencies in industry's ability to accurately represent the performance of IBRs and study the effects of IBR on the bulk power system (BPS).
- In response to these disturbances, NERC has issued 10 major event reports and four Level 2 Alerts. The *Level 2 Alert: IBR Performance Issues²* findings report contains the following critical findings:
- (i) The voluntary recommendations set forth in NERC guidelines and other publications are not being implemented by GOs.
 - (ii) Many GOs indicated that they did not have the requested facility data readily available.
 - a. The information requested in the worksheet is fundamental equipment information that NERC expects would be retained and easily accessible with some assistance from equipment manufacturers, if necessary.
- Assessment of the data received and feedback from entities during the *Level 2 Alert: IBR Model Quality Deficiencies³* provided additional evidence of the critical findings above. NERC issued its second-ever deadline extension for this alert due to numerous questions and comments received that indicated the requested data was still not readily available, resulting in another extremely low data submission worksheet submit rate.
- The information provided in response to this alert will also be of use to the potential Standards Drafting Team (SDT) working on the Reliability Standard FAC-001 and FAC-002 Standard Authorization Request sent by the Reliability and Security Technical Committee (RSTC) to the Standards Committee (SC). NERC anticipates that the data obtained will support effective and efficient review of the modeling issues by any SDT.
- ¹ Inverter-Based Resource (IBR): A plant/facility consisting of individual devices that are capable of exporting Real Power through power electronic interfaces(s), such as an inverter or converter, and that are operated together as a single resource at a common point of interconnection to the electric system. Examples include, but are not limited to, plants/facilities with solar photovoltaic (PV), Type 3 and Type 4 wind, battery energy storage system (BESS), and fuel cell devices.
- ² https://www.nerc.com/nstc/RSTC_Reliability_Guidelines/NERC_Inverter-Based_Resource_Performance_Issues_Public_Report_2023.pdf
³ <http://www.nerc.com/pw/irm/topics/alerts/2020/NFIP%20Alert%20Lev%20-%20-%20Inverter-Based%20Resource%20Model%20Quality%20Deficiencies.pdf>
- RELIABILITY | RESILIENCE | SECURITY

here

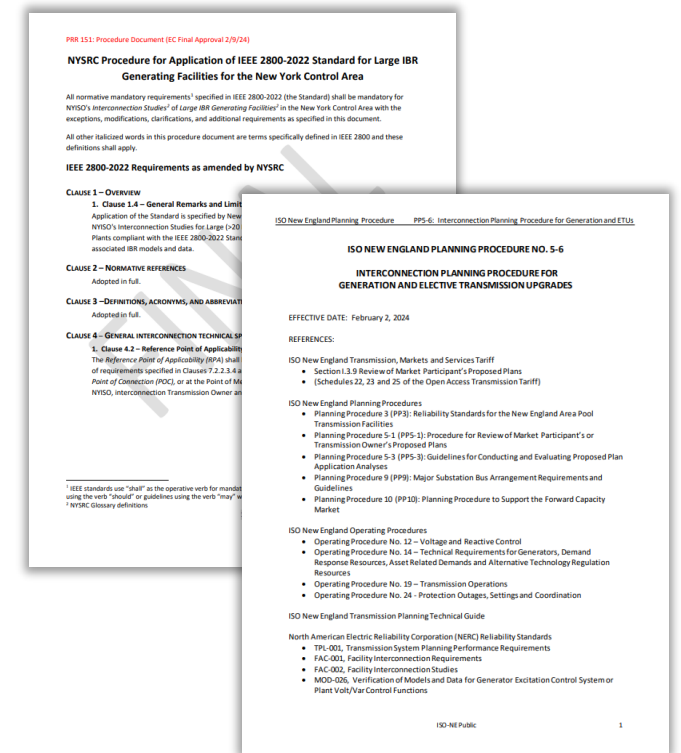
IEEE 2800-2022 and IEEE P2800.2



The What



The How



Implementation

How This Impacts Industry

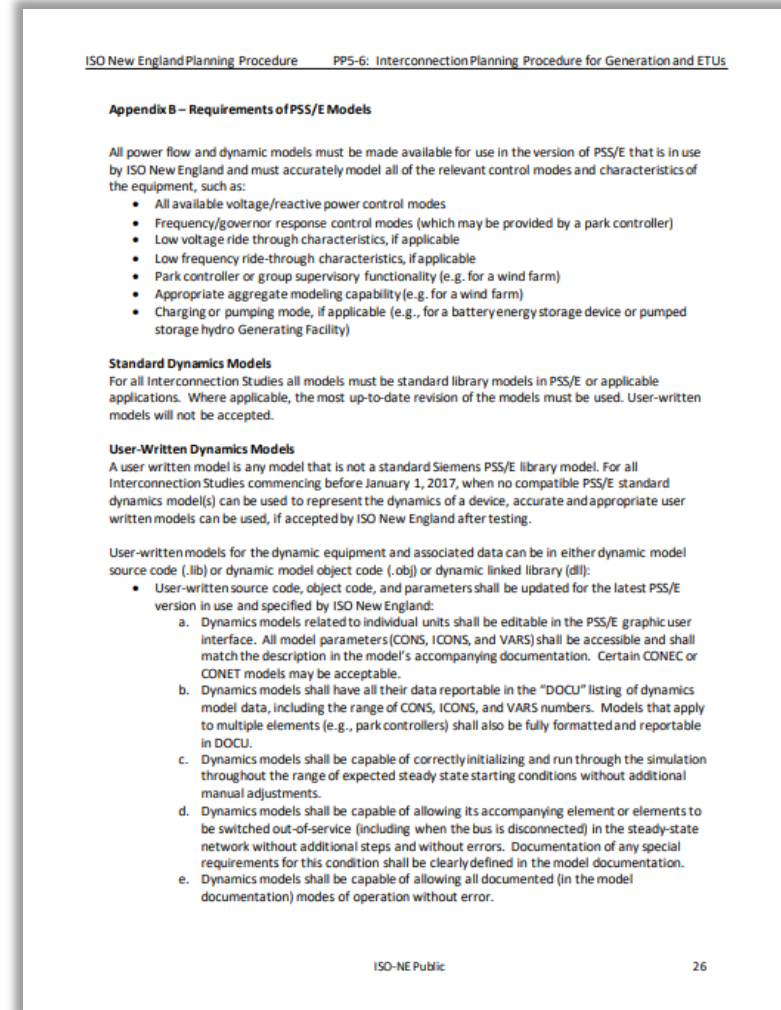
Drivers and Activities



Clear and Effective Requirements

- IEEE 2800-2022 Requirements
- Requirements for PSS/Models
- Requirements for PSCAD Models
- IBR Facility Study Considerations
- Procedures for Material Modifications
- Etc.

Goal: Clear expectations for interconnection customers!



Steps to Ensure Accurate and Quality Models

Steps for GOs to follow to ensure they meet NERC requirements and recommendations

1

Start with the as-left settings – attestations from OEMs, actual field parameters extracted from HMI, pulled relay records, etc.

2

Gather and identify the latest “active” models across platforms (e.g., PSSE UDM, PSSE standard library, PSCAD, TSAT).

3

Perform model verification to verify that the model matches the as-left configuration, protection, and control settings.

4

Verify that models match across platforms structurally, control modes, settings, parameters, etc.

5

Perform rigorous model quality tests and model benchmarking across all applicable models.

6

Tune the IBR plant models if deficiencies are identified; iterate until accuracy matches are obtained.

7

Follow TP and PC processes for sharing models and/or making site modifications, if needed.

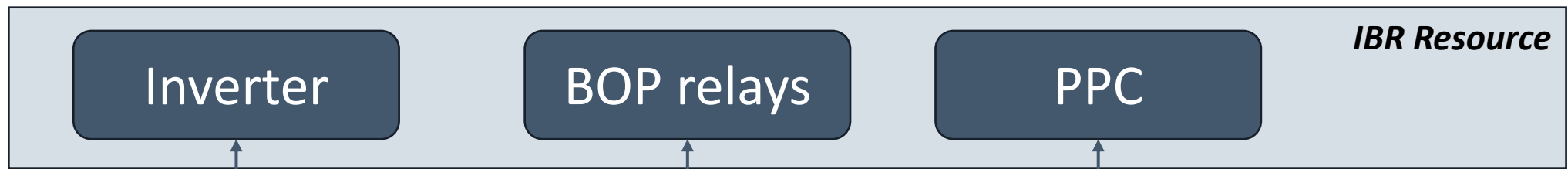
As-Lefts: Inconsistencies in Data

- Inconsistencies between data source:
 - Inverter documentation, as-left settings, specification sheets, narratives, etc.
 - OEM-supplied information
 - Relay .rdb files
 - Dynamic models (PSS®E, PSCAD™, TSAT™) discrepancies or omissions
 - Version control issues
- Inabilities to easily extract useful information from IBR units
 - Room for human error
 - Need machine readable files/forms, computer vision to identify inconsistencies
 - Standardized framework encouraged
- Errors exist in protection settings, imagine errors in inverter settings



Common Deficiencies and Modelling Issues

- Flat run issues across SCRs – unstable from the beginning
- Incorrect ride-through mode set
- Models do not include the same controls as the hardware
- Frequency response or voltage control parameters do not match as-lefts
- Model trips during expected ride-through events
- Inappropriate dynamic response during tests – poor response, unstable, etc.
- Many models with unclear labeling – uncertainty in what is “active model”
- Lack of documentation



IBR Resource

Inverter

BOP relays

PPC

.IBR file*

**OEM auto-
translator****

**.dyr,
.txt**

PSCAD

PSS®E

DSATools™
Dynamic Security Assessment Software

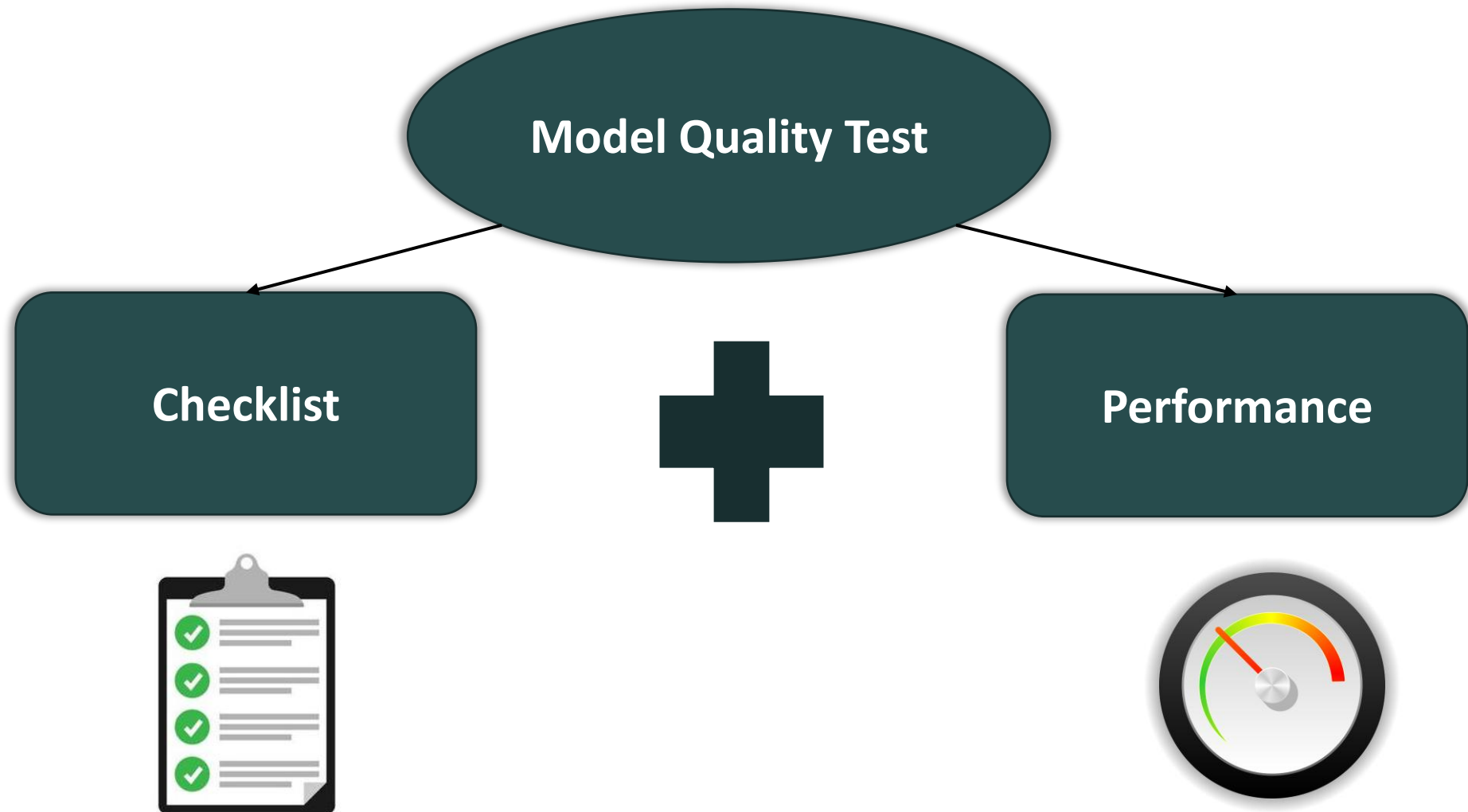
Elevate-GridStrong Automated Model Quality Assessment Tool

*Encrypted password protected standardized file which includes framework for all IBR parameters, data can flow two ways and remains on the cloud for entities (GOs ISO, OEMs, consultants...) to access. (Not all data is accessible to all entities)

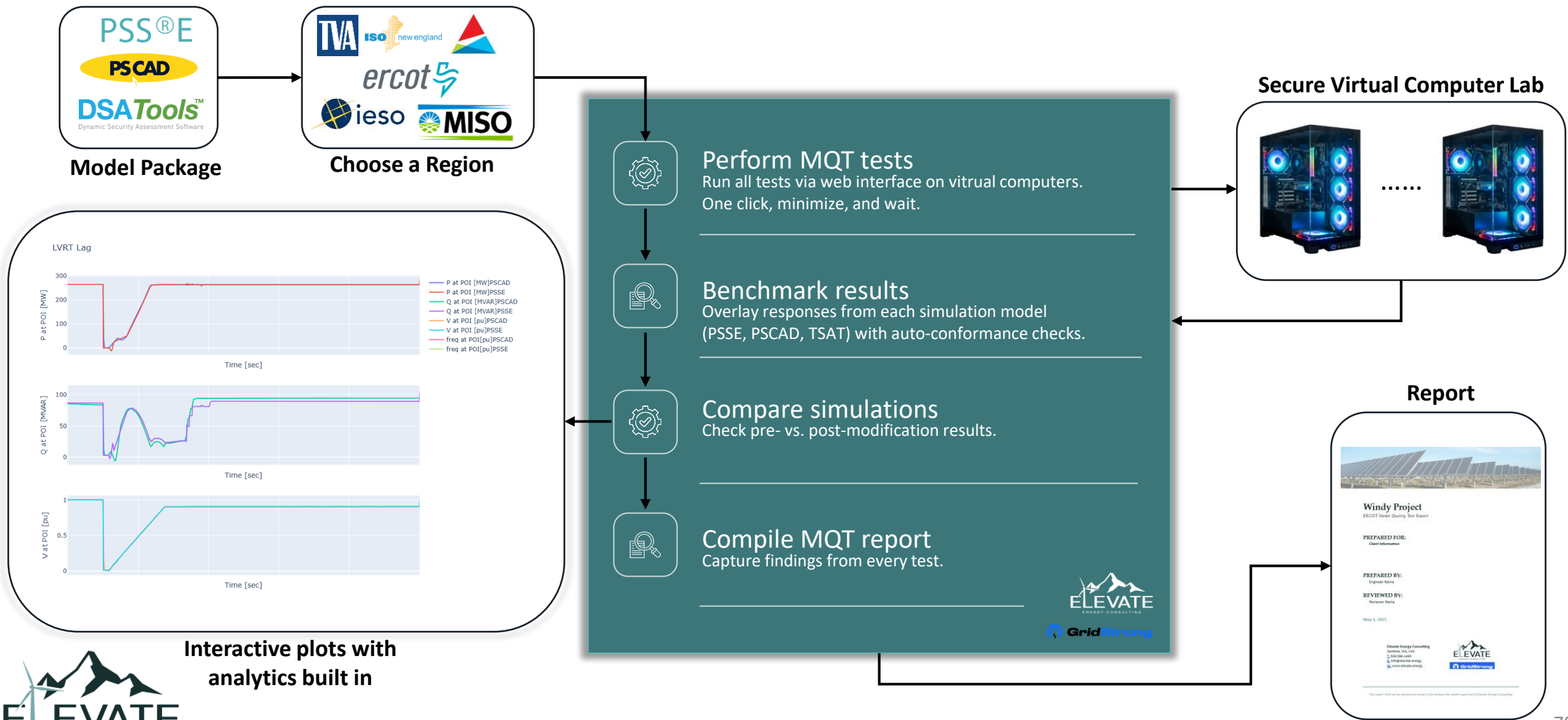
**OEM auto-translator will utilize the .IBR file and auto-translate and create the necessary files (.dyr, .txt, etc.) that will be read in by the appropriate simulation software (PSCAD, PSSE, TSAT).

The various IBR plant models need to reflect and represent the as-left IBR plant components

Types of MQT



Model Quality Automation



Model Versus As-Left Equipment

- After performing the MQT Tests and system studies
- As-left settings should **REFLECT** the model parameters that were tuned to ensure stability
- Otherwise, what is the point? Avoid this:

As-Lefts in the Field



Model Parameters in Simulation



Concluding Remarks



What's Next?

- IBR model requirements at ISO and NERC level evolving
- IBR model quality review processes also evolving
- Changes to IBR plant (controls, protections, settings, etc.) require model updates; have downstream NERC standards impacts as well (PRC, MOD, etc.)
- Model benchmarking requirements across models
- Careful IBR model development, verification, and validation
- Automation to expedite and reduce areas for error
- High trust and confidence in modelers – expertise across platforms matters

NERC References

- Level 2 Alert on IBR Model Quality Deficiencies (June 2024) – [here](#)
- Report on Level 2 Alert on IBR Model Quality Deficiencies (April 2025) – [here](#)
- Level 3 Alert on IBR Performance and Modeling (May 2025) – [here](#)
- NERC Standards Under Development – [here](#)
- FERC Order 901 Summary Graphic of Milestone 3 (as of July 2025) – [here](#)
- FERC Order 901 Summary Information of Milestone 3 (as of July 2025) – [here](#)
- Project 2020-06 Verification of Models and Data for Generators – [here](#)
- Project 2021-01 System Model Validation with IBRs – [here](#)
- Project 2022-02 Uniform Modeling Framework for IBR – [here](#)
- Project 2022-04 EMT Modeling – [here](#)



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Electronic Modeling Lessons Learned & Challenges for Inverter-Based Resources

Todd Chwialkowski

Director, Transmission Regulatory & Compliance
EDF power solutions North America

NPCC Reliability Forum | August 7, 2025



Agenda

- Introduction to EDF power solutions North America
- Generator Requirements
- Improving Accuracy and Reliability
- Lessons Learned

EDF power solutions



EDF power solutions North America specializes in low-carbon power generation, storage, and energy management solutions that create value—from origination to operation—to help customers reduce long-term energy costs, increase resiliency, and achieve sustainability goals.

As owner-operators of one of the largest clean energy portfolios on the continent, and with deep experience developing and operating low-carbon energy assets, we bring a **full-suite of solutions** for grid-scale, distribution-scale, asset optimization, and onsite power production.

Our outstanding capabilities allow us to utilize our in-house experts, providing **maximal efficiency and end-to-end oversight** of any size of energy project.



23 GW
developed



16 GW
service contracts



43 GW
pipeline



1,600
employees



Est. 1987

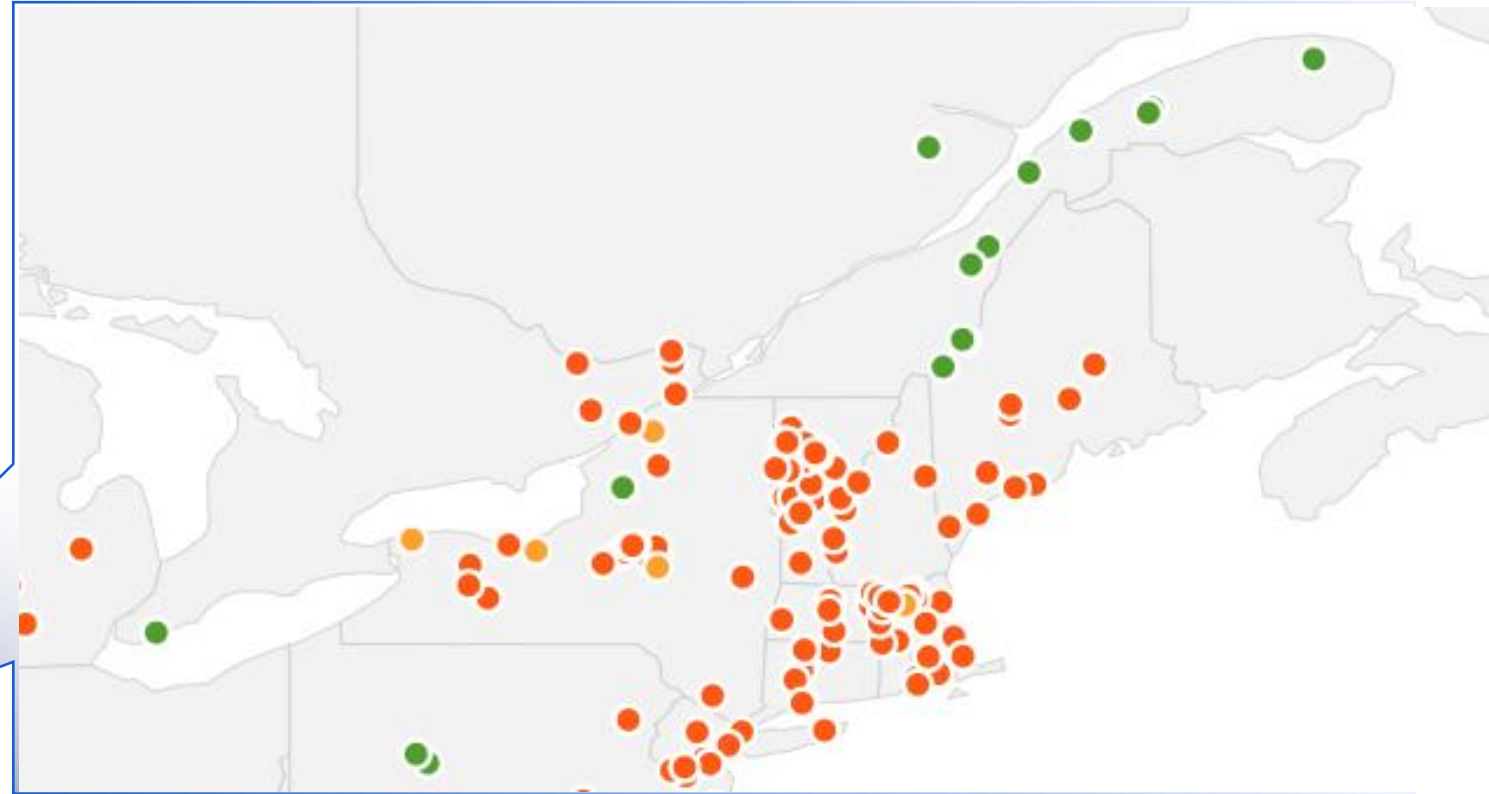
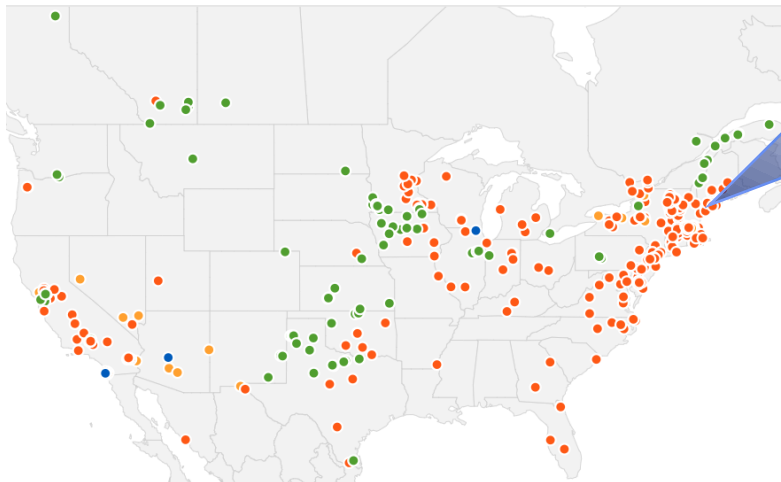


U.S., Canada,
and Mexico

as of 12/31/24

EDF power solutions in the Northeast

- Wind
- Solar
- Solar + Storage



EDF power solutions' Grid-Scale and Distribution-Scale Generation Covers North America

IBR Model Technical Overview: Types of Models

In general, IBRs are required to submit two types of models to ISOs and TPs:
Positive Sequence Model and **Electromagnetic Transient Model**

Positive Sequence (RMS) Model

Used for large system planning studies, e.g. FIS study, System Operating Limit (SOL) study, etc.



- Steady State power flow model **.raw**
- Dynamic model **.dyr**
- Short circuit model **.seq**



- Steady State power flow model **.raw**
- Dynamic model **.dyr**
- Short circuit model **.seq**
- On-line Dynamic Security Assessment (**On-line DSA**)

Electromagnetic Transient Model (EMT)

More smaller area/site/equipment level studies, e.g. TOV study, SSR study, control interaction study



- Plant model (steady state "power flow" model)
- Detailed device controller model
- Models all frequencies and all three phases

Plant models may include OEM generator model, PPC model, Shunt Reactors & Capacitors, Transformer(s) (OLTC), etc.

Requirements for Inverter Based Resources (IBRs)



Prior to FERC Order

901, NERC Milestone 3:

FAC-002 / MOD-026 /
MOD-027 / MOD-032:
Positive Sequence Library
and User-Defined Models



Post NERC

Milestone 3:

MOD-026-2 / MOD-032-2:
Positive Sequence Library
and User-Defined Models,
EMT Models + + + (FAC-
002-5: Project 2023-5)



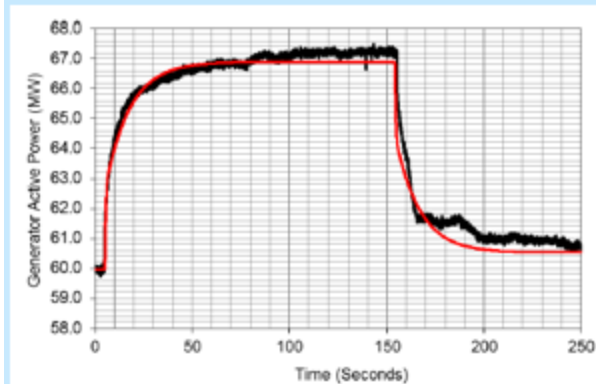
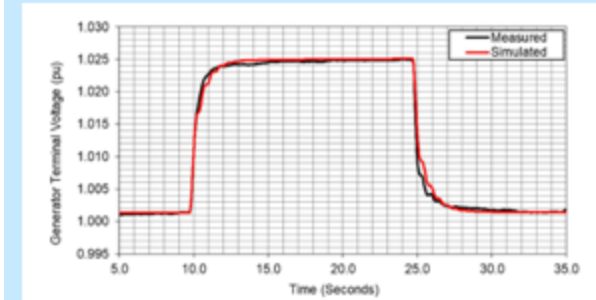
"It is the responsibility of each project developer and GO to meet the modeling requirements established by the TP and PC and to provide adequate proof of conformance to the requirements. It is the responsibility of each GO to maintain an accurate model throughout the lifecycle of the project. GOs shall notify the TP and PC of any expected changes or updates (per NERC FAC-002) for in-service equipment and submit updated models accordingly."



WHY IS THIS IMPORTANT? EMT models will provide better quality and accuracy—but are not always available!

Requirements for IBRs: NERC & ISOs

NERC & EROs	PSSE Generic	PSSE UDM	PSLF	PSCAD	TSAT	MQT
NERC (MOD-026-2 / MOD-032-2)	✓	✓	✗	✓	✗	✓
Regions	PSSE Generic	PSSE UDM	PSLF	PSCAD	TSAT	MQT
NYISO	✓	✗	✗	✓	✗	same as ISO-NE, PJM
ISO-NE	✓	✗	✗	✓	✓	Tests as per PP5-6
CAISO	✗	✗	✓ (library models only)	✓	✗	✗
ERCOT	✓	✓	✗	✓	✓	✓
PJM	✓	✗	✗	?	✗	Flat Start and Bump Test
MISO	✓	✗	✗	✓	✓	Flat Start and Bump Test
SPP	✓	✓	✗	✓	✓	Flat Start and Bump Test
Puerto Rico	✓	✓	✗	✓	✗	
Hawaii HECO	✓	✓	✗	✓	✗	PSSE PSCAD Simulation testing
TVA	✓	✗	✗	✓	✗	
IESO	✓		✗	✓	✗	
Hydro Quebec	✓	✓	✗	EMTP RV	✗	
AESO	✓	✗	*	Optional as of now	✗	
Other Entities						
WECC	✗	✗	✓ (library models only)	✓	✗	✗



WHY IS THIS IMPORTANT? NERC has high-level requirements; ISOs develop actual requirements for interconnection through generation & **USE** the models.

IBR Plant Model Overview: Components of the Plant Model

IBRs are required to submit plant models: *Tuned IBR Unit Model*, *Tuned PPC Model*, & *BOP Model*

OEM Provided (3rd Party Engineering)

Tuned IBR Unit Model

IBR Unit Model: model of the specific inverter / turbine (normally OEM provided)

Protection / Control Settings: tuned specifically for the plant (updated during project stages)

Tuned PPC Model

PPC Unit Model: Model of the PPC representing the control design

PPC Parameters: tuned specifically for the operation of the plant (updated during project stages)

Generator Owner Provided (3rd Party Engineering)

Balance of Plant Model

Transmission Line

Collector System

Transformers

Reactive Compensation

Modeling Requirements for IBRs

Outsourcing vs. Bringing the Function In-house



ACCOMPLISHING THE TASK

Smaller GOs: OEMs, 3rd-party engineering

Mid-sized GOs: Some in-house tasks, verification and validation, + OEMs, 3rd-party engineering

Large GOs: In-house management, 3rd-party engineering

CHALLENGES

- › Integration of diverse models to develop a plant model; lack of tools and resources [= cost]; time
- › Modeling new technologies and characteristics; lack of expertise
- › Verification and validation: data availability and quality
- › Standardization of modeling practices

WHY DOES THIS MATTER? Balancing cost, time, and resources = success with accurate and quality models!

Reliability & Reality: Opportunities

Current IBRs (Legacy Generation Plants):

- P & Q capability
- Frequency and voltage ride-through capability
- Improved data monitoring and reporting (e.g. ERCOT NOGRR-245, NERC PRC-028-1)

> Basic modeling

IBRs in Development (Future Generation Plants):

- Grid support services
- P & [increased] Q capability
- Faster response to events
- Enhanced frequency and voltage ride-through capability
- Continued response over longer periods of time before tripping
- Grid-forming vs. grid-following

> Increased accuracy with modeling

To date, NERC and ERCOT have proposed ***retroactive implementation*** (applies to both current generation and future projects).



ISOs / RTOs are utilizing various strategies in their implementation of the IEEE2800-2022 requirements.

Thank you

Contact:

todd.chwialkowski@edf-re.com



Energy Designed for the Future.



Reliability Forum Survey

- Scan the QR or use link to join
 - [Survey link](#) will be provided in the Q&A section of Microsoft Teams



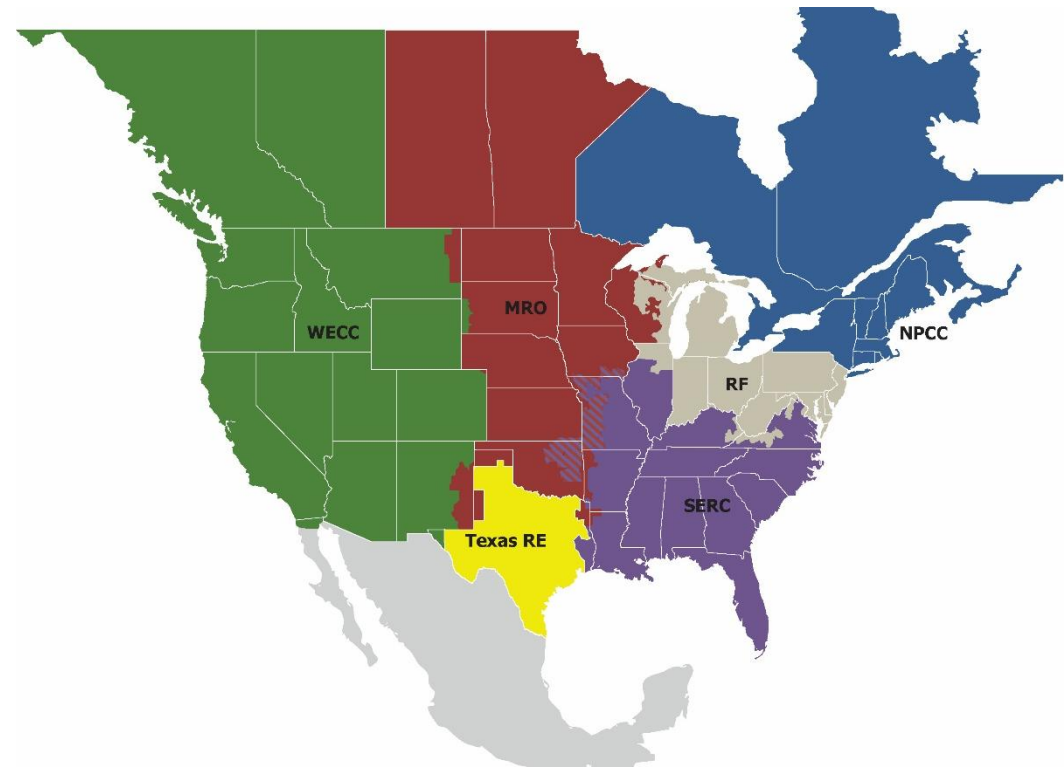


NPCC Long Term Strategy

To assure effective and efficient reduction of risks to the reliability and security of the grid

2025 Outreach Activities

- **Reliability Forums - March, May, Aug., Oct.**
 - Various Reliability Topics
 - Electric Vehicles, Energy Storage, Large Loads, FERC Order 901– Data and Model Validation
- **State and Provincial Outreach Topics**
 - NERC and NPCC Seasonal Reliability Assessments
 - State of Reliability
 - Interregional Transfer Capability Study (ITCS)
 - FERC Order 901 (September 2025)
- **Regional Webinars/Workshops**
 - Physical and Cyber Security
 - Extreme Weather Preparedness
- **2024 NPCC Northeast Gas-Electric Study**



[NERC Regions Map](#)



NPCC Long Term Strategy

To assure effective and efficient reduction of risks to the reliability and security of the grid

Comments/Suggestions

[Contact Us](#)

[NPCC Reliability Forums](#)

[NPCC Guidance Document](#)