

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Reliability Standards for Frequency )  
and Voltage Protection Settings and ) Docket No. RM25-3-000  
Ride-Through for Inverter-Based Resources )

**COMMENTS OF THE NEW YORK INDEPENDENT SYSTEM OPERATOR ON  
THE RELIABILITY STANDARDS ESTABLISHING PERFORMANCE  
REQUIREMENTS FOR INVERTER-BASED RESOURCES**

The New York Independent System Operator, Inc. (“NYISO”) respectfully submits these comments in response to the Federal Energy Regulatory Commission’s (“the Commission”) Notice of Proposed Rulemaking (“NOPR”) proposing to approve North American Electric Reliability Corporation (“NERC”) Reliability Standards PRC-024-4 (Frequency and Voltage Protection Settings for Synchronous Generators, Type 1 and Type 2 Wind Resources, and Synchronous Condensers) and PRC-029-1 (Frequency and Voltage Ride-through Requirements for Inverter-Based Resources (“IBR”)).<sup>1</sup>

The NYISO appreciates NERC’s work on Standards PRC-024-4 and PRC-029-1, largely supports them as drafted, and believes that they will support the continued reliable operation of the nation’s electric system. The NYISO submits these comments to address the Commission’s request for comments on NERC’s proposed exemption provision in PRC-029-1, Requirement 4.<sup>2</sup> Specifically, the NYISO asks the Commission to: (1) direct NERC to revise Requirement 4 to permit IBRs to seek an exemption to the voltage and

---

<sup>1</sup> Docket No. RM25-3-000, *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards PRC-029-1 and PRC-024-4* (filed Nov. 4, 2024).

<sup>2</sup> *Id.* at P.

frequency ride-through requirements if they have executed an interconnection agreement and the primary construction or procurement agreements for their facility, and (2) provide clarification as to the intended role of the Planning Coordinator, Transmission Planner, Transmission Operator, Reliability Coordinator for the consideration of exemptions as set forth in Requirement 4.

**I. NOT YET IN SERVICE IBRs SHOULD BE PERMITTED TO SEEK EXEMPTIONS UNDER PRC-029-1, REQUIREMENT 4**

In its NOPR, the Commission specifically solicits comments on the adequacy of the proposed PRC-029-1 exemption provisions in Requirement 4 pertaining to both IBRs currently in service and those under contract but not yet in service. The NYISO agrees with and supports the exemption provisions as drafted with respect to IBRs in service by the effective date of the standard, but urges the Commission to direct NERC to permit IBRs that have executed both an interconnection agreement and primary construction or procurement agreements to seek exemptions to the ride-through requirements.

NERC's Petition for Approval of Proposed Reliability Standards PRC-029 and PRC-024-4 notes that application of PRC-029 to certain existing Generators could require redesign and retrofit that would be unreasonable and unduly burdensome, which could lead to undesirable impacts on reliability.<sup>3</sup> The NYISO asserts that this reasoning may apply to IBRs that have already been studied in the interconnection process, executed an interconnection agreement, and have already contracted for equipment that may not be able to meet all of the applicable ride-through requirements. Thus, the NYISO believes it is appropriate to permit such IBRs to be eligible to seek exemption from the ride-through

---

<sup>3</sup> *North American Electric Reliability Council*, Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards PRC-029 and PRC-024-4, RM25-3-000 (Nov. 4, 2024) at p. 38.

requirements in PRC-029-1, as they may face design requirement changes that could significantly delay or even derail the project otherwise. However, the NYISO does not take any position at this time on whether any particular exemption should be granted by the Compliance Enforcement Authority (“CEA”), in the event they are given the opportunity to do so.

The NYISO is aware of IBR generation within its interconnection queue for which the developer has executed an interconnection agreement and equipment purchase contracts; indeed, under the inclusion rules for the NYISO’s long term planning studies, that generation is currently assumed to be in-service in outer years.

For these reasons, the NYISO supports the Commission directing NERC to incorporate into PRC-029-1, Requirement 4, the opportunity for IBR generation with an executed interconnection agreement and purchase contracts for equipment to seek exemption to ride-through requirements if necessary.

**II. THE COMMISSION OR NERC SHOULD PROVIDE GUIDANCE ON THE INTENDED ROLE OF REGISTERED ENTITIES RECEIVING INFORMATION CONCERNING EXEMPTION REQUESTS PURSUANT TO PRC-029-1, REQUIREMENT 4**

In the draft of PRC-029-1 filed with the Commission, generators seeking exemptions pursuant to Requirement 4 must provide certain registered entities—namely, Transmission Planner, Planning Coordinator, Reliability Coordinator, and Transmission Operator—details concerning the hardware limitations underlying the need for that exemption. While Requirement 4 suggests that the CEA will make the final determination as to whether an exemption is accepted, neither PRC-029-1, Requirement 4 nor NERC’s petition set forth a specific role for the registered entity receiving information concerning the exemption and hardware limitations. The NYISO supports giving the named registered

entities the opportunity to provide feedback to the CEA in the event warranted and believes this is the intention of receiving and having the right to request additional information as described in Requirement 4. To that end, while the NYISO does not believe that further standard revisions are necessary to address the role of the registered entities named therein, we respectfully ask that either the Commission or NERC confirm that the intention of providing information to those registered entities is for the purpose of developing feedback to the CEA as appropriate.

### **III. COMMUNICATIONS AND CORRESPONDENCE**

All communications and correspondence concerning these comments should be served as follows:

Robert E. Fernandez, Executive Vice President, General Counsel &  
Chief Compliance Officer  
\*Christopher Sharp, Senior Compliance Attorney  
Raymond Stalter, Director of Regulatory Affairs  
New York Independent System Operator, Inc.  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-6000  
Fax: (518) 356-4702  
csharp@nyiso.com

\*Person designated for receipt of service

#### IV. CONCLUSION

The NYISO respectfully asks that the Commission direct NERC to revise Requirement 4 to permit IBRs to seek an exemption to the voltage and frequency ride-through requirements if they have executed an interconnection agreement and the primary construction or procurement agreements for their facility, and provide clarification as to the intended role of the Planning Coordinator, Transmission Planner, Transmission Operator, Reliability Coordinator for the consideration of exemptions as set forth in Requirement 4.

Respectfully submitted,

/s/ Christopher Sharp

Christopher Sharp

Senior Compliance Attorney

New York Independent System Operator, Inc.

Dated: March 24, 2025

cc: Janel Burdick  
Emily Chen  
Jignasa Gadani  
Jette Gebhart  
Leanne Khammal  
Jaime Knepper  
Kurt Longo  
David Morenoff  
Jason Rhee  
Douglas Roe

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. §385.2010.

Dated at Rensselaer, NY this 24<sup>th</sup> day of March 2025.

*/s/ Elizabeth Rilling*

Elizabeth Rilling  
New York Independent System Operator, Inc.  
10 Krey Blvd.  
Rensselaer, NY 12144  
(518) 356-6177