RD26-10 – Justification Summary

NERC made a series of changes to Requirement R4. NERC expanded the eligibility for the hardware limitation to include IBRs that are in service after the effective date of PRC-029-1 and have: (1) an executed interconnection agreement by the effective date of Reliability Standard PRC-029-1; and (2) an equipment procurement contract for hardware causing the limitation that was executed prior to the first day of the first month following the effective date of the applicable governmental authority's order approving Reliability Standard PRC-029-1 (i.e., prior to September 1, 2025). Attachment 1 has a new item 12 that provides that a voltage source converter (VSC)-HVDC-connected IBR is not required to comply with one or more of items 7, 8, or 9. Item 12 would exempt HVDC-connected IBRs with choppers from the ride through criteria in Items 7, 8, and 9, as the integrated system is inherently unable to meet these specific criteria without safety or damage risk. Measure 4 is also modified to clarify that each generator owner submitting supporting information for hardware limitations under Requirement R4.1.

Based on staff review of the revisions to PRC-029-2, we find that there is no change in burden for generator owners when compared to previous version of the standard.