

**Justification technique des normes de
fiabilité
(version anglaise)**

Technical Rationale

Project 2020-02 Modifications to PRC-024 (Generator Ride-through)

PRC-024-4 – Frequency and Voltage Protection Settings for Synchronous Generators, Type 1 and 2 Wind Plants, and Synchronous Condensers

General Rationale

The drafting team proposes to modify PRC-024-3 to retain the Reliability Standard as a protection-based standard with applicability to only synchronous generators, synchronous condensers, and type 1 and 2 wind plants. This proposal is a consequence of both the different natures of synchronous and inverter-based generation resources and several recent events exhibiting significant IBR ride-through deficiencies. The behavior of rotating synchronous generators during faults and other disturbances on the transmission system is well established and understood in comparison to IBR generation. The disturbance ride-through vulnerabilities of synchronous generators are pole slipping instability and undervoltage dropout of critical plant auxiliary equipment, leading to tripping of a generator. Pole slipping (or loss of synchronism) can be managed by active power dispatch constraints or stability System Operating Limits, and is outside the scope of Project 2020-02. Undervoltage dropout of critical auxiliary equipment is also outside the scope of Project 2020-02 because of complexities associated with auxiliary systems and how such equipment behaves under low voltage conditions. The Project 2020-02 Standard Authorization Request (SAR) notes that auxiliary equipment has not posed a ride-through risk and the SAR specifically excludes modifications in PRC-024-3 for auxiliary equipment.

Over-frequency protection, under-frequency protection, over-voltage protection, and under-voltage protection may or may not be applied to synchronous generating units. If applied, settings should be coordinated between the needs of generating unit protection and the no-trip zones within PRC-024-4 attachments. Coordination of generating unit capabilities, voltage regulating controls, and protection is addressed within PRC-019-2. Excitation and governing controls affect synchronous generator ride-through behavior to some degree but because of progressive improvement, standardization, and level of maturity of these controls, they are rarely a cause of unnecessary tripping during disturbances. In addition, there are other existing NERC standards to prevent unnecessary tripping of the generators during a system disturbance such as PRC-025-2 “Generator Relay Loadability” and PRC-026-2 “Relay Performance During Stable Power Swings”. For these reasons, there is no need to impose actual disturbance ride-through requirements on synchronous units but only to include restrictions for frequency and voltage protection setting ranges as maintained in PRC-024-4.

Rationale for Applicability Section (4.0)

Functional Entities (4.1)

The functional entity responsible for setting frequency, voltage, and volts per hertz protection for synchronous generators, type 1 and 2 wind plants, and synchronous condensers is either the Generator Owner ~~(GO)~~ or Transmission Owner ~~(TO)~~. Planning Coordinators ~~(PC)~~ are retained as applicable entities only in the Quebec Interconnection. Modifications are proposed in PRC-024-4 to expand functional entity

applicability to include “Transmission Owners that apply protection” because of the inclusion of synchronous condenser applicability in section 4.2.2.

Facilities (4.2)

Applicability Facilities subparts in Section 4.1.1 were modified to restrict PRC-024-4 to synchronous generators and type 1 and 2 wind plants. Section 4.2.2 was added to cover synchronous condensers and associated equipment.

Rationale for Requirements R1 through R4

Modifications were made to Requirements R1, R2, R3, and R4 to include the Transmission Owner as a functional entity applicable to each requirement because of the addition of synchronous condensers.

Modifications were made to Requirements R1, R2, R3, and R4 to include language for type 1 and 2 wind plants and synchronous condensers and to remove language that relates to inverter-based resource (IBR) functionality since IBRs will be addressed in a new standard PRC-029-1.

Technical Rationale

Project 2020-02 Modifications to PRC-024 (Generator Ride-through)

PRC-029-1 – Frequency and Voltage Ride-through Requirements for Inverter-based Generating Resources

General Rationale

The drafting team has created a new Reliability Standard (PRC-029-1) to address inverter-based resource (IBR) disturbance Ride-through performance criteria. This proposal is a consequence of both the different natures of synchronous and inverter-based generation resources and several recent events exhibiting significant IBR Ride-through deficiencies¹. The proposed PRC-029-1 aligns with certain Ride-through requirements of IEEE Std 2800™, IEEE Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems, primarily for frequency Ride-through, and is structured to follow language from FERC Order No. 901, which states that “NERC has the discretion to consider during its standards development process whether and how to reference IEEE standards in the new or modified Reliability Standards.”²

The lack of standardization of IBR performance and the software-based nature of the technologies has created reliability challenges associated with the interconnection of IBR facilities to the power grid. The nature of the fast switching of power electronics of IBR generation, IBR’s software-based nature, and the electronic interface to the transmission system is such that disturbance Ride-through behavior is largely determined by manufacturer-specific equipment and controls system designs. These controls may be programmed, but also have more restrictive limits on current, both in magnitude and duration. IBR responses to grid disturbances are highly controlled and managed by using fast switching of power electronics devices dependent upon manufacturer specific control system design software that can be programmed in many ways and with various and concurrent Ride-through performance objectives. Rather than attempting to restrict the myriad of control approaches, protections, and settings, it is more straightforward to require Ride-through during defined frequency and voltage excursions.

In contrast to synchronous generation, the need for IBR Ride-through requirements has been heightened by recent events during which IBRs have not met PRC-024-3 frequency and voltage Ride-through expectations, often due to controls and protection only indirectly associated with the system voltage and frequency excursions. In addition to Ride-through, there is the question of what IBRs should be doing as they Ride-through. IBR responses to system disturbances can be beneficial or detrimental to both their own Ride-through and system reliability, often depending on adjustable control settings. Thus, it is essential to set expectations on performance during Ride-through as well as Ride-through capability.

¹ [Event Reports \(nerc.com\)](https://www.nerc.com/Event-Reports)

² P 195, FERC Order No. 901; https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20231019-3157&optimized=false; October 17, 2023

A further reason for proposing a separate IBR standard is that the inertial and short circuit contributions from IBR are significantly different than synchronous machines. The drafting team thinks that IBRs should Ride through voltage and frequency excursions up to their maximum capability, while using expanded voltage and frequency Ride-through criteria to drive those enhancements. These differences between synchronous machines and IBR contribute to the differences in the frequency and voltage tables and graphs between the PRC-024-4 and PRC-029-1 standards.

The proposed PRC-029-1 must be understood generally as an event-based standard though it is also required to provide evidence of the ability to Ride-through disturbance events by means of dynamic models and simulation results. Compliance with PRC-029-1 is determined chiefly, though not exclusively, from IBR Ride-through performance during transmission system events in the field. An IBR becomes noncompliant with PRC-029-1 when an event in the field occurs that shows that one or more requirements were not satisfied. This intent is clarified by *Operations Assessment* as the Time Horizon designation of requirements R1-R3.

FERC Order No. 901 Directives

PRC-029-1 is proposed in consideration of directives from FERC Order No. 901 that were assigned to the Project 2020-02 drafting team. The following directives were assigned to this drafting team for inclusion in this standards project (paragraph numbers of the FERC Order are included for reference):

- Paragraph 190: “Pursuant to section 215(d)(5) of the FPA, we adopt the NOPR proposal and direct NERC to develop new or modified Reliability Standards that require registered IBR generator owners and operators to use appropriate settings (i.e., inverter, plant controller, and protection) to ride through frequency and voltage system disturbances and that permit IBR tripping only to protect the IBR equipment in scenarios similar to when synchronous generation resources use tripping as protection from internal faults.”
- Paragraph 190: “The new or modified Reliability Standards must require registered IBRs to continue to inject current and perform frequency support during a Bulk-Power System disturbance.”
- Paragraph 190: “Any new or modified Reliability Standard must also require registered IBR generator owners and operators to prohibit momentary cessation in the must Ride-through zone during disturbances.”
- Paragraph 190: “NERC must submit new or modified Reliability Standards that establish IBR performance requirements, including requirements addressing frequency and voltage ride through, post-disturbance ramp rates, phase lock loop synchronization, and other known causes of IBR tripping or momentary cessation.”
- Paragraph 193: “Therefore, we direct NERC through its standard development process to determine whether the new or modified Reliability Standards should provide for a limited and documented exemption for certain registered IBRs from voltage ride through performance requirements.”

- Paragraph 193: “Further, we direct NERC to ensure that any such exemption would be applicable for only existing equipment that is unable to meet voltage Ride-through performance. When such existing equipment is replaced, the exemption would no longer apply, and the new equipment must comply with the appropriate IBR performance requirements specified in the Reliability Standards (e.g., voltage and frequency ride through, phase lock loop, ramp rates, etc.)”
- Paragraph 193: “Finally, we direct NERC, through its standard development process, to require the limited and documented exemption list (i.e., IBR generator owner and operator exemptions) to be communicated with their respective Bulk-Power System planners and operators (e.g., the IBR generator owner’s or operator’s planning coordinator, transmission planner, reliability coordinator, transmission operator, and balancing authority).”
- Paragraph 199: “Pursuant to section 215(d)(5) of the FPA, we modify the NOPR proposal. To the extent NERC determines that a limited and documented exemption for those registered IBRs currently in operation and unable to meet voltage Ride-through requirements is appropriate due to their inability to modify their coordinated protection and control settings, we direct NERC to develop new or modified Reliability Standards to mitigate the reliability impacts to the Bulk-Power System of such an exemption.”
- Paragraph 208: “Pursuant to section 215(d)(5) of the FPA, we adopt the NOPR proposal and direct NERC to develop and submit to the Commission for approval new or modified Reliability Standards that require post-disturbance ramp rates for registered IBRs to be unrestricted and not programmed to artificially interfere with the resource returning to a pre-disturbance output level in a quick and stable manner after a Bulk-Power System.”
- Paragraph 209: “The proposed new or modified Reliability Standards must require registered IBRs to ride through momentary loss of synchronism during Bulk-Power System disturbances and require registered IBRs to continue to inject current into the Bulk-Power System at pre-disturbance levels during a disturbance, consistent with the IBR Interconnection Requirements Guideline and Canyon 2 Fire Event Report recommendations.”
- Paragraph 209: “Related to ACP/SEIA’s comment recommending to revise the directive to require generators to maintain synchronism where possible and continue to inject current to support system stability, we direct NERC, through its standard development process, to consider whether there are conditions that may limit generators to maintain synchronism.”
- Paragraph 209: “We direct NERC to submit to the Commission for approval new or modified Reliability Standards that would require registered IBRs to ride through any conditions not addressed by the proposed new or modified Reliability Standards that address frequency or voltage ride through, including phase lock loop loss of synchronism.”
- Paragraph 226: “Further, we believe that there is a need to have all of the directed Reliability Standards effective and enforceable well in advance of 2030 and direct NERC to ensure that the associated implementation plans sequentially stagger the effective and enforceable dates to ensure an orderly industry transition for complying with the IBR directives in this final rule prior to that date.” (*pertains to multiple projects*)

Rationale for Applicability Section (4.0)

Functional Entities (4.1)

The functional entity responsible for assuring acceptable Ride-through performance of IBR is the Generator Owner.

Facilities (4.2)

Applicability Facilities include only IBR that also meet NERC registration criteria. Language used within PRC-029-1 applicability only refers to IBR as a whole plant/facility. Consistent with FERC Order No. 901, IBR performance is based on the overall IBR plant and disturbance monitoring equipment requirements established under the proposed PRC-028-1. Requirements within PRC-029-1 do not apply to individual inverter units or measurements taken at individual inverter unit terminals.

Rationale for Requirement R1

The objective of Requirement R1 is to ensure that all applicable IBRs will Ride-through grid voltage disturbances consistent with the must Ride-through zone and operation regions specified in **Attachment 1**. IBRs must be able to demonstrate Ride-through performance, that they remain electrically connected, i.e., shall not trip, and continue to exchange current, i.e., shall not enter momentary cessation.

The drafting team determined that the definition of “must Ride-through zones” and “operation regions” should be consistent with those terms as used within IEEE 2800-2022. Additionally, the team determined that the voltage thresholds of each operation region should be based on measurements taken on the high-side of the main power transformer in PRC-029-1, also consistent with IEEE 2800-2022.

Battery Energy Storage Systems (BESS) units also must comply with Requirement R1 in all operating modes including charging, discharging, and idle (energized, but not charging or discharging). A BESS in idle mode must be capable of responding to system voltage and frequency excursions as it does in charging or discharging modes.

Exceptions to **Attachment 1** performance criteria are allowable when 1) an IBR needs to trip to clear a fault, 2) voltage at the high-side of the main power transformer goes outside an accepted and a documented hardware equipment limitation established in accordance with Requirement R4, 3) instantaneous positive sequence voltage phase angle jumps more than 25 electrical degrees at the high-side of the main power transformer initiated by a non-fault switching events occur on the transmission system, or 4) volts per Hz (V/Hz) at the high-side of the main power transformer exceed 1.1 per unit for longer than 45 seconds or exceed 1.18 per unit for longer than 2 seconds.

When a grid disturbance occurs, such as a close-in fault or a relatively large switching event, the grid voltage may experience a rapid phase angle shift. In such cases, the phase displacement $\Delta\theta$ can be large enough to pose challenges for the phase lock loop (PLL) to track the terminal voltage, cause control instability within the inverter, such as the inner current control loop or the DC link control loop, and even lead to tripping of the inverter due to the malfunction of the controls.

Since phase angle jumps are common occurrences on the BPS, this standard requires the IBR to be designed and operated to Ride-through a minimum phase angle jump of 25 electrical degrees. This is a typical value and aligns with the requirement in IEEE 2800-2022.

Some IBR equipment has PLL loss of synchronism protection, referring to a protective function that operates when the angle displacement $\Delta\theta$ exceeds a threshold for a predetermined period of time (on the order of a couple of milliseconds). Historically, this protection has been used by some inverter manufacturers, especially for inverters in distribution systems. For the IBR connected to the BPS, this protection function should be disabled. If it is enabled, the phase angle jump protection setting should be configured such that the IBR shall only trip to prevent equipment damage.

Rationale for Requirement R2

In addition to having minimum voltage Ride-through capability specified in Requirement R1, all applicable IBRs are also required to adhere to certain voltage Ride-through performance criteria during system disturbances. Acceptable performance criteria depend on the operation region that an IBR is presently in or when in transition from one operation region to another operation region. Requirement R2 includes specific performance criteria and is needed to assure consistent IBR performance within and each operation region in **Attachment 1** and when in transition between regions.

Rationale for Requirement R2.1

This subpart of Requirement R2 ensures that when the voltage at the high-side of the main power transformer (MPT) recovers to the continuous operation region from either the mandatory operation region or the permissive operation region, an IBR delivers the pre-disturbance level of Real Power or available Real Power, whichever is less. Available Real Power allows for changes of facility Real Power output attributed to factors such as weather patterns, change of wind, and change in irradiance, but not changes attributed to IBR tripping in whole or part. This requires an IBR to exit the “High Voltage Ride Through (HVRT)” or “Low Voltage Ride Through (LVRT)” modes properly such that it does not cause reduction in the Real Power when the high-side of MPT voltage recovers to within the continuous operation region.

When the voltage at the high-side of the MPT is greater than 0.90 per-unit and less than 0.95 per-unit, IBRs are expected to exit the LVRT mode and come back to “normal operating mode”. If an IBR has a default total current limit of 1.0 per-unit, the apparent power production of an IBR will be limited below 1.0 per-unit (e.g., the per-unit value of IBR terminal voltage). In such case, the IBR needs to configure a preference setting, either to maintain pre-disturbance Real Power or maximize the Reactive Power in order to further help with voltage recovery, or according to requirements specified by the Transmission Planner, Planning Coordinator, Reliability Coordinator, or Transmission Operator.

Rationale for Requirement R2.2

This subpart of Requirement R2 ensures that when the voltage at the high-side of the MPT is within the mandatory operation region, IBRs inject or absorb reactive current proportional to the level of terminal voltage deviations they measure. IBRs shall follow Transmission Planner, Planning Coordinator, Reliability

Coordinator, or Transmission Operator specified certain magnitude of Reactive Power response to voltage changes, if available.

By default, reactive current prioritization shall be configured unless Transmission Planner, Planning Coordinator, Reliability Coordinator, or Transmission Operator requires Real Power priority.

Rationale for Requirement R2.3

This subpart of Requirement R2 ensures that when the voltage at the high-side of the MPT is within the permissive operation region, IBRs continue to Ride-through, though they are briefly allowed to enter the current block mode if necessary to avoid tripping off from the grid. The drafting team takes into consideration the physical operational capability of the power electronics devices under such low voltage conditions. However, the IBR facility shall restart current exchange in less than or equal to five cycles of positive sequence voltage returning to the continuous operation region or mandatory operation region. If the interconnecting entity has performance requirements that are more stringent than the standard, the Generator Owner should follow the requirements set by the interconnecting entity.

Rationale for Requirement R2.4

This subpart of Requirement R2 ensures when a fault is cleared on the transmission system, the voltage regulators of connected IBRs must adjust the reactive current injection to restore the transmission system voltage to the pre-disturbance voltage as defined by the automatic voltage regulator (AVR) setpoint. The drafting team acknowledges that tuning of the AVR requires a balance between multiple competing physical factors, e.g., rise time, overshoot, and transient stability. However, it is anticipated that IBR controls will be tuned to allow for a stable post-disturbance voltage recovery without causing excessive overshoot or undershoot of the setpoint. When such overshoots do occur, they must not exceed the magnitude and duration of the applicable table given in **Attachment 1**. Furthermore, this standard anticipates that control system tuning to prevent such over/under voltages will focus on the speed at which the controller responds to setpoint changes rather than on the magnitude of the reactive current response. For example, reductions in k-factor to prevent over/under voltages should only be considered as a last resort.

Rationale for Requirement R2.5

This subpart of Requirement R2 ensures that the IBR returns to effective pre-disturbance operation unless otherwise specified or needed by the Transmission Planner, Planning Coordinator, Reliability Coordinator, or Transmission Operator.

Rationale for Requirement R3

The objective of Requirement R3 is to ensure that IBRs Ride-through frequency excursion events with magnitude and time durations as defined in Attachment 2.

Grid frequency reflects the balance of system generation and load. A system event that causes a generation/load imbalance will cause system frequency to deviate from nominal. The system may experience an over-frequency event (in the case of more generation than load) or an under-frequency event (in the case of less generation than load). Inertia resists the deviation from nominal frequency,

giving the operators additional time to rebalance generation and load. With the current resource mix, system inertia is dependent on the amount of rotating mass connected to the system (i.e., synchronous generators or motors). The larger the system inertia, the slower the system frequency will deviate from the nominal value and the lower the grid Rate Of Change Of Frequency (ROCOF), giving more time to try to rebalance generation and load.

A reduction in system inertia is an inevitable consequence of a power system transiting toward more IBR and less synchronous generators, however the utilization of IBR-specific control features (i.e., advanced control modes and Grid Forming technologies) can provide additional stability benefits to help mitigate the loss of inertia. As discussed in the previous paragraph, less system inertia means the frequency will deviate from the nominal value more quickly during a generation/load imbalance event and will expose the system to a higher ROCOF. A wider frequency Ride-through capability for IBR may be required to avoid the risk of widespread tripping.

When considering an expansion of Ride-through capability, it is important to balance the expansion with the feasibility of producing and installing equipment that can meet the newly proposed criteria. Failure to adequately consider this could result in resource adequacy deficiencies if expanded criteria lead to widespread non-compliance of legacy IBR due to hardware limitations. Further, for newly interconnecting IBR, expanded Ride-through criteria often result in significant design changes that have production time and cost implications. If proposed Ride-through criteria are too stringent and result in costly design changes, those costs could result in a slowing of IBR penetration on the BPS.

For the reasons above, it is imperative that newly created Ride-through criteria are reasonable for both BPS reliability and for the IBR equipment. To date, NERC has analyzed numerous major events including both winter storms Uri and Elliot. No IBR tripped offline for frequency threshold criteria (because the system frequency caused a trip due to exceeding equipment frequency limits) and all frequency-related tripping observed were due to mis-parameterization or the use of instantaneous measurements in protection schemes. Additionally, the deviations in frequency observed during the events listed above did not exceed the PRC-024 criteria. It should be noted that winter storm Uri did produce a frequency excursion extremely close to, and even touching, the criteria in PRC-024.

With no “benchmark events” to inform criteria expansions, studies could be used to assess future BPS needs. These studies would need a detailed list of scenarios, including different IBR penetrations and load levels, and are dependent on the ability to accurately model current and future IBR technologies, including GFM functions. NERC has issued two level 2 alerts related to IBR, one on IBR performance and the second on modeling. These alerts seek to obtain data from IBR while also giving recommendations to mitigate the observed systemic modeling and performance deficiencies of IBR. Given these observed deficiencies and the lack of recently conducted detailed system-wide studies, there is insufficient study-based evidence to inform widely expanded Ride-through criteria.

It is clear however that the performance of the BPS during disturbance will change as the IBR penetration increases. How this performance will change can be predicted with detailed studies, but an incremental

approach to expanding Ride-through criteria adds additional stability margin while modeling deficiencies are addressed and detailed studies are conducted.

The frequency Ride-through times and thresholds in IEEE 2800-2022 are more stringent (wider) than those presently in PRC-024-3 and contain continuous operation ranges that exceed the frequency excursions observed during major BPS disturbances. Detailed feedback from original equipment manufacturers (OEM) provides insight that they are already designing IBR equipment that conforms with the criteria in IEEE 2800-2022. For this reason, the frequency Ride-through criteria in the PRC-029 standard are in alignment with those criteria in IEEE 2800-2022, which provides an expansion of Ride-through criteria compared to PRC-024 while also minimizing cost and timeline implications as OEM are already designing conforming equipment.

Requirement R3 does not prescribe specific frequency protection settings for IBR equipment. IBR frequency protection settings should only be set to protect the IBR from damage caused by operation at off-nominal frequency. An IBR owner must ensure that the IBR frequency protection does not prevent an IBR from meeting the R3 Ride-through requirement.

This standard requires that IBRs remain electrically connected and continue to exchange current during a frequency excursion event in which the frequency remains within the must Ride-through zone according to **Attachment 3** and while the absolute ROCOF magnitude is less than or equal to 5 Hz/second. Some IBR controllers and their ability to remain electrically connected and continue to exchange current with the grid are sensitive to ROCOF, particularly auxiliary equipment that are essential for IBR performance, during a frequency excursion event. If needed to maintain the stability of the IBR or prevent equipment damage, the R3 requirement allows the IBR to trip for an absolute ROCOF exceeding 5Hz/sec within the must Ride-through zone of **Attachment 2**. Failure to Ride-through due to ROCOF exceeding 5Hz/sec shall only be allowed during a generator/load imbalance event that causes the frequency to deviate from nominal.

To minimize the misoperation tripping of the IBR on the ROCOF setting, the rate of change of frequency (ROCOF) must be calculated as the average rate of change over multiple calculated system frequencies for some time greater than or equal to 0.1 seconds. The ROCOF calculation is not applicable during the fault occurrence and clearance (i.e., protection should not trip due to any perceived ROCOF during the entire disturbance and recovery period) and should not operate at the onset of a fault, during a fault, or at fault clearance, i.e., it should be disabled during faults. The IBR shall Ride-through any system disturbance while the voltage at the high-side of the main power transformer remains within the must Ride-through zones as specified in **Attachment 1**. The ROCOF measurement should begin after fault clearance and is only applicable for generation/load imbalance disturbances such as a system separation, an island condition, or the loss of a large load or generator.

Rationale for Requirement R4

The objective of Requirement R4 is to ensure legacy IBR (IBR existing as of the enforcement date of PRC-029-1) are able to obtain an exemption to the voltage and frequency Ride-through requirements if hardware replacements or other costly upgrades would be necessary to comply with Requirements R1

through Requirement R3. This provision allows such exemptions as long as such limitations are documented and communicated to the Planning Coordinator, Transmission Planner, Reliability Coordinator, and Transmission Operator of the respective footprints in which the IBR project is located. The Planning Coordinator, Transmission Planner, Reliability Coordinator, and Transmission Operator will then need to take the voltage Ride-through limitations into account in planning and operations.

Limitations must not be construed as complete exemptions from the applicable tables, but must be specific as to which voltage or frequency band(s) and associated duration(s) cannot be satisfied or specific as to the number of cumulative voltage deviations within a ten-second time period that the equipment can Ride-through if less than four. Limitation descriptions should identify the specific equipment and explain the characteristic(s) of that equipment that prevent Ride-through. If any equipment limitation is removed or otherwise corrected, it is likewise necessary to communicate to the Planning Coordinator, Transmission Planner, Reliability Coordinator, and Transmission Operator of this.