

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

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

COMMENTS OF ARIZONA PUBLIC SERVICE COMPANY

Arizona Public Service Company (“APS”) submits comments regarding the Federal Energy Regulatory Commission’s (“FERC”) Notice of Proposed Rulemaking (“NOPR”)¹ issued on December 19, 2024, in the above captioned docket.

1. INTRODUCTION AND BACKGROUND

APS, a wholly owned subsidiary of Pinnacle West Capital Corporation, is a vertically integrated public utility doing business under the laws of the State of Arizona, and is engaged in generating, transmitting, and distributing electricity in eleven of Arizona’s fifteen counties. APS serves more than one million retail electric customers and participates in wholesale markets throughout the Western Interconnection. APS is registered with the North American Electric Reliability Corporation (“NERC”) for purposes of compliance with the Electric Reliability Standards and performs 10 of the registered NERC functions.²

¹ Reliability Standards for Frequency and Voltage Protection Settings and Ride-Through for Inverter-Based Resources, 189 FERC ¶ 61,212 (2024) (“NOPR”).

² APS is registered with NERC as a Balancing Authority, Transmission Operator, Transmission Owner, Transmission Planner, Transmission System Provider, Planning Authority, Generation Operator, Generation Owner, Resource Planner, and Distribution Provider.

2. COMMENTS

APS supports the proposed reliability goals to address frequency and voltage ride-through for Inverter-based Resources (“IBRs”) and FERC’s proposal to approve the term “Ride-through” in the NERC Glossary of Terms and the approval of proposed Reliability Standard PRC-024-4. APS also agrees with and supports the comments that were submitted by the Edison Electric Institute (“EEI”) on behalf of its members. These comments suggest the following modifications be made to PRC-029-1:

- a. FERC should revise the proposed exemption cut-off date in Requirement 4 of PRC-029-1 to address long lead time projects.
- b. FERC should direct NERC to develop a transparent exemption process in support of Requirement 4 to address industry clarity and NERC and Regional Entity consistency.
- c. FERC should modify the proposed NERC compliance reporting requirements to provide an accurate reflection of the performance characteristics and reliability contributions of legacy and long lead time IBRs.

3. CONCLUSION

APS appreciates the opportunity to submit comments on the proposals provided in this NOPR. For the reasons stated within the EEI comments, we respectfully request that FERC accept the EEI comments and adopt them in the forthcoming final rule.

Respectfully submitted,

/s/ Todd Komaromy

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March 24, 2025

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.

Dated at Phoenix, Arizona, this 24th day of March, 2025.

/s/ Todd Komaromy

Todd Komaromy

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