

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

Reliability Standards for Frequency and Voltage
Protection Settings and Ride-Through for Inverter-
Based Resources

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Docket No. RM25-3-000

**MOTION TO REPLY AND REPLY COMMENTS OF
THE EDISON ELECTRIC INSTITUTE**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission”),¹ the Edison Electric Institute (“EEI”) hereby moves for Commission approval to submit these reply comments in response to initial comments on the Commission’s December 19, 2024 Notice of Proposed Rulemaking (“NOPR”)² that proposed to approve Reliability Standards PRC-024-4³ and PRC-029-1⁴, which the North American Electric Reliability Corporation submitted in response to Commission’s directives. In that NOPR the Commission sought input on all aspects of their proposal approval. EEI filed comments on the NOPR on March 24, 2025.⁵ EEI now submits the following reply to the comments of the California Independent System Operator Corporation, ISO New England Inc., Midcontinent Independent System Operator, Inc., PJM Interconnection, L.L.C., and the Southwest Power Pool, Inc. (collectively, the “Aligned ISOs/RTOs”).⁶ Good cause exists to

¹ 18 C.F.R. 385.212.

² Reliability Standards for Frequency and Voltage Protection Settings and Ride-Through for Inverter-Based Resources, *Notice of Proposed Rulemaking*, 189 FERC ¶ 61,212 (Dec. 19, 2024).

³ Frequency and Voltage Protection Settings for Synchronous Generators, Type 1 and Type 2 Wind Resources, and Synchronous Condensers.

⁴ Frequency and Voltage Ride-through Requirements for Inverter-Based Resources.

⁵ Reliability Standards for Frequency and Voltage Protection Settings and Ride-Through for Inverter-Based Resources, Docket No. RM25-3-000, *Comment of the Edison Electric Institute* (Mar. 24, 2025) (“EEI Initial Comments”)

⁶ Reliability Standards for Frequency and Voltage Protection Settings and Ride-Through for Inverter-Based Resources, Docket No. RM25-3-000, *Comment of the California Independent System Operator Corporation, ISO New England Inc., Midcontinent Independent System Operator, Inc., PJM Interconnection, LLC, and the Southwest Power Pool, AKA Aligned ISOs/RTOs* (Mar. 24, 2025).

grant EEI's motion as these comments will provide useful information to the Commission. More specifically, EEI submits these reply comments to clarify EEI's position on PRC-029-1 Exemptions and how they should be applied.

I. IDENTIFICATION OF THE FILING PARTY

EEI is the association that represents all U.S. investor-owned electric companies. EEI members provide electricity to more than 250 million Americans and operate in all 50 states and the District of Columbia. The electric power industry supports more than seven million jobs in communities across the United States. EEI members are investing more than \$200 billion this year to make the energy grid more secure against all hazards, including cybersecurity threats. The EEI member companies' approach to cybersecurity is driven by factors unique to their operational environment including (but not limited to) their operational safety; regulatory requirements; affordability; and threat-informed, risk-based analysis.

II. REPLY COMMENTS

The Aligned ISOs/RTOs state that they "support the applicability of proposed Reliability Standard PRC-029-1 and reinforce support for a broadly-applicable standard that is *applied in a manner that limits exemptions to limited and rare circumstances*."⁷ The proposed exemptions process is already designed to be narrow and requires Generator Owners ("GOs") seeking an exemption for voltage or frequency ride-through to be specific to the portion of the ride-through criteria that the resource cannot meet. It is also important to recognize that GOs, under PRC-029-1, will be obligated to make changes to settings or software updates that align Inverter-based Resources (IBRs) performance as close as possible to PRC-029-1 ride-through requirements. As a result, the changes that will be made will largely mitigate the performance issues that FERC

⁷*Id.* at 5..

Order 901 intended to address, even with exemptions for legacy IBRs and IBRs provided under long lead time projects.

However, the inability of legacy IBRs to obtain needed exemptions could create reliability and security risk if much needed capacity is shuttered or otherwise delayed for extended periods of time in order to effectuate performance capabilities that may not be needed in the foreseeable future at a time when the electric load is significantly increasing. This includes long lead time projects with specific design related limitations and non-compliant equipment already delivered and, in some cases, partially deployed, as referenced and defined in EEI's March 24, 2025 comments⁸ to the NOPR. For these reasons, EEI asks that FERC maintain the exemptions provided to legacy IBRs and direct NERC to modify the R4 exemption process to also include long-lead time IBR projects with specific design related limitations and equipment already contracted for, delivered, and in some cases, partially deployed be eligible for exemptions.

III. CONCLUSION

EEI and its members request that the Commission grant its motion to reply and appreciate the opportunity to submit these reply comments on the proposals provided in this NOPR.

Respectfully submitted,

Andrea Koch
Senior Director, Reliability Policy
akoch@eei.org

Mark Gray
Senior Manager, Transmission Operations
mgray@eei.org

Edison Electric Institute
701 Pennsylvania Ave., N.W.
Washington, DC 20004
(202) 508-5000

⁸ EEI Initial Comments at 2.