**1. RECOMMENDED ACTION: EFFECT OF EC VOTE TO ACCEPT RECOMMENDED ACTION:**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Accept as requested |  | Change to Existing Practice |
|  | Accept as modified below | X | Status Quo |
| X | Decline |  |  |

**2. TYPE OF DEVELOPMENT/MAINTENANCE**

|  |  |
| --- | --- |
| **Per Request:** | **Per Recommendation:** |
|  | Initiation |  | Initiation |
|  | Modification |  | Modification |
|  | Interpretation |  | Interpretation |
|  | Withdrawal |  | Withdrawal |
|  |  |  |  |
|  | Principle |  | Principle |
|  | Definition |  | Definition |
|  | Business Practice Standard |  | Business Practice Standard |
|  | Document |  | Document |
|  | Data Element |  | Data Element |
|  | Code Value |  | Code Value |
|  | X12 Implementation Guide |  | X12 Implementation Guide |
|  | Business Process Documentation |  | Business Process Documentation |

**3. RECOMMENDATION**

**SUMMARY:**

2024 WEQ Annual Plan Item 1.d – Develop and/or modify any necessary business practice standards, including revisions to WEQ-022 EIR Business Practice Standards, to complement and support new organization registration roles for inverter-based resources within the NERC Compliance Registry

**Recommended Standards:**

The subcommittee recommends no action at this time.

**4. SUPPORTING DOCUMENTATION**

**a. Description of Request:**

2024 WEQ Annual Plan Item 1.d – Develop and/or modify any necessary business practice standards, including revisions to WEQ-022 EIR Business Practice Standards, to complement and support new organization registration roles for inverter-based resources within the NERC Compliance Registry

**b. Description of Recommendation:**

The subcommittee recommends no action at this time.

**c. Business Purpose:**

The WEQ CISS has determined there are no needed modifications to the NAESB WEQ Business Practice Standards based on the changes developed by NERC, and approved by FERC, regarding the modifications to the NERC Rules of Procedure to support the registration of inverter-based resources (IBRs) in the NERC Compliance Registry. As part of Appendix 2 Definitions Used in the Rules of Procedure, effective June 27, 2024, NERC expanded the definition for Generator Operator and Generator Owner to include certain categories of non-Bulk Electric System inverter based generating resources. Within the NAESB EIR, entities may register for an operation role, merchant role, and/or additional role. As identified in the WEQ-022 EIR Business Practice Standards, the Purchase Selling Entity is the designated role for entities performing commercial or market functions within the wholesale electric market. The WEQ CISS has reviewed the definition for Purchase Selling Entity in WEQ-000 Abbreviations, Acronyms, and Definition of Terms and agrees that the term is defined in such a way that it encompasses the needed commercial functions (purchase-selling, load serving, and generator providing) at this time. Further, the definition clarifies that a Purchase Selling Entity may or may not own generating facilities. Additionally, entities registering in the NAESB EIR have the option to register in an Observer role. This role provides a registration mechanism for entities who do not serve in one of the identified merchant, operations, or other defined roles. The WEQ CISS concluded that as the NAESB EIR already accommodates the registration of an entity that may be owning or operating an IBR, there is not a need at this time to modify the WEQ-022 EIR Business Practice Standards.

The WEQ CISS also made a determination that there is no need to modify any other WEQ Business Practice Standards at this time as the expansion of the NERC Rules of Procedure definitions for Generator Operator and Generator Owner to include IBRs will not impact commercial scheduling and transmission management operations for the wholesale electric industry.

This does not preclude future standard development efforts that may be needed to support NERC development of reliability requirements applicable to IBRs and/or business practices to support consistency and interoperability in the integration and use of IBRs, including batteries and other distributed energy resources, by the electric industry

**d. Commentary/Rationale of Subcommittee(s)/Task Force(s):**

See the following WEQ CISS Meeting Minutes:

* February 14, 2024
* March 13, 2024
* April 15, 2024
* July 24, 2024