

**Sonia Seda**

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**From:** Hart, Patrick (GE Renewable Energy) <pathart@ge.com>  
**Sent:** Thursday, July 22, 2021 2:53 PM  
**To:** Comentaros  
**Subject:** Comments on NEPR-MI-2019-0009 and CEPR-M 1-20 18-0 008

To whom it may concern,

I'm a controls engineer responsible for developing facility level control of GE Wind, Solar and Storage generating facilities.

In Section 6.08 regarding power factor, it states:

"Generating Facilities or Microgrids with greater than 1 MW Nameplate Rating interconnected to the Transmission System must operate within the range of 0.999 absorbing to 0.999 injecting for all real power output greater than or equal to 25% of rated capacity (kW rated). The flow of reactive power at the Point of Common Coupling, either absorbing or injecting, should not exceed 4.5% of its nominal capacity (kW rated)."

It appears to limit the ability of a facility to support voltage regulation requirements. Is that the intent? Are generating facilities greater than 1MW not expected to provide significant reactive power support services?

The IEEE P2800 standard is a draft that provides a transmission level equivalent to IEEE 1547. Has this been considered when drafting the requirements for PR?

Are there working groups that support the resolution of these comments? If so, is participation from OEMs allowed? I would be happy to provide feedback on capabilities that may support the resilience of the system.

Thanks!  
Pat

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