

NERC welcomes suggestions to improve the reliability of the bulk power system through improved reliability standards. Please use this form to submit your request to propose a new or a revision to a NERC's Reliability Standard.

	Request to	propose a new or	a revisior	to a Reliability Standard
Title of Proposed Standard: Generator Operation		n for Mai	n for Maintaining Network Voltage Schedules	
Date Submitted: January 13, 2012				
SAR Requester	Information			
Name:	Stephen Cru	tchfield		
Organization:	NERC			
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SAR Type (Chec	k as many as a	applicable)		
New Stan	New Standard Withdrawal of existing Standard			thdrawal of existing Standard
Revision to existing Standard Urgent Action		gent Action		
1				
		SAR Ir	nformatio	n
Industry Need (What is the in	dustry problem this i	request is	trying to solve?):
This SAR propos	ses to modify	VAR-002-1b, R1 to ac	ldress an a	ambiguity in the standard.
Purpose or Goa	l (How does th	nis request propose t	o address	the problem described above?):
N/A				
Identify the Obj		•	requirem	ents (What specific reliability deliverables
N/A				

SAR Information

Brief Description (Provide a paragraph that describes the scope of this standard action.)

This SAR proposes to modify VAR-002-1b, R1 to address an ambiguity in the standard.

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR. Also provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

Requirement R1 of VAR-002-1.1b states the following:

R1. The Generator Operator shall operate each generator connected to the interconnected transmission system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless the Generator Operator has notified the Transmission Operator.

NERC received a request to interpret this requirement. The requester stated:

"During startup and shutdown of a generator, it is industry practice to have a generator's AVR in the manual mode. Due to the instabilities associated with the changes in the field during these times, it is more reliable to have an operator control the generator than the AVR. Further, an AVR's response is slower and more unreliable when the field current is low, which is the case during start up and shut down. Both the BA and TOP realize that during start up and shut down the real and reactive power from that generator cannot be counted upon for system stability.

Some regions have taken the stance that during start up and shut down of a generator, it is reasonable to assume that the AVR is in manual and that it will be switched to automatic once stable. This would not require contacting the TOP to state that the AVR is in manual for this time period. Other regions have taken the approach that all status changes of the AVR from automatic, regardless of industry practice and stability, needs to be communicated to the TOP.

Constellation is seeking clarification of Requirement R1 as to whether or not a communication must be conducted between a GOP and a TOP during start up or shut down of a generator, when

SAR Information

the unit is not stable and is not counted upon for real or reactive power by the BA and TOP at that time.

Constellation has found two issues caused by the lack of clarity/incorrect interpretation of this standard:

- 1. There is not a consistent view across the regions with regard to this requirement. Such inconsistencies are contrary to the intent of NERC's CMEP and can expose entities to inconsistent evaluations. A procedure may be compliant in one region and may not be in another.
- 2. Requiring a GOP to communicate that the AVR is in manual during start up/shutdown is an unnecessary distraction at a time when the unit is unstable. A generator operator already communicates to the TOP that the unit is being started up or shutting down. Adding another communication imposes a redundant task when the generator operator is focused on controlling the unit and ensuring the reliability of the BES."

The Standards Committee approved the use of a "rapid modification" approach to clarify the requirement in question directly in lieu of a formal interpretation. The Interpretation Team is proposing the attached modification to the standard in lieu of an Interpretation. The redline standard includes the FERC approved VRFs and VSLs for this standard.

	Reliability Functions		
The S	The Standard will Apply to the Following Functions (Check each one that applies.)		
	Regional Reliability Organization	Conducts the regional activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the Bulk Electric System within the region and adjacent regions.	
	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.	



	Reliability Functions
Balancing Authority	Integrates resource plans ahead of time, and maintains load- interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.
Interchange Authority	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.
Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.
Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.
Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.
Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
Transmission Owner	Owns and maintains transmission facilities.
Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.
Distribution Provider	Delivers electrical energy to the End-use customer.
Generator Owner	Owns and maintains generation facilities.
Generator Operator	Operates generation unit(s) to provide real and reactive power.
Purchasing-Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.
Market Operator	Interface point for reliability functions with commercial functions.
Load-Serving Entity	Secures energy and transmission service (and reliability-related services) to serve the End-use Customer.

Reliability and Market Interface Principles



	Reliability and Market Interface Principles			
Appl	Applicable Reliability Principles (Check all that apply).			
\boxtimes	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.			
	2. The frequency and voltage of interconnected bulk power systems shall be contro defined limits through the balancing of real and reactive power supply and dema			
\boxtimes	 Information necessary for the planning and operation of interconnected bulk pov shall be made available to those entities responsible for planning and operating t reliably. 	-		
	4. Plans for emergency operation and system restoration of interconnected bulk po shall be developed, coordinated, maintained and implemented.	ower systems		
	5. Facilities for communication, monitoring and control shall be provided, used and for the reliability of interconnected bulk power systems.	maintained		
	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.			
	7. The security of the interconnected bulk power systems shall be assessed, monito maintained on a wide area basis.	ored and		
	8. Bulk power systems shall be protected from malicious physical or cyber attacks.			
	the proposed Standard comply with all of the following Market Interface iples?	Enter (yes/no)		
1	A reliability standard shall not give any market participant an unfair competitive advantage.	Yes		
2	A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes		
3	A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes		
4	A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes		

Related Standards			
Standard No.	Explanation		



Related Standards

Related SARs		
SAR ID	Explanation	

	Regional Variances		
Region	Explanation		
ERCOT			
FRCC			
MRO			
NPCC			
RFC			
SERC			
SPP			



	Regional Variances
WECC	