

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Consideration of Comments Summary

Project 2013-04 Voltage and Reactive Control

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RELIABILITY | ACCOUNTABILITY



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Introduction

The Project 2013-04 standard drafting team (SDT) thanks all commenters who submitted comments on the draft VAR-002-3 standard. This standard was originally posted with VAR-001-4 for a 45-day public comment period from August 23, 2013 through September 3, 2013. Both proposed standards were revised and re-posted for a successive ballot from October 11, 2013 to November 26, 2013. VAR-001-4 received the necessary approval and went forward to a final ballot. However, VAR-002-3 only received 66.09% of the weighted segment vote. A total of 58 sets of comments were received during the second 45-day public comment period. This document will present a summary of the comments considers by the SDT after the most recent comment period for VAR-002-3.

All comments submitted may be reviewed in their original format on the standard's project page.¹

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.²

¹ The project page is available here: <http://www.nerc.com/pa/Stand/Pages/Project2013-04VoltageReactiveControl.aspx>.

² The appeals process is in the Standard Processes Manual:

http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Consideration of Comments

Purpose

The VAR SDT appreciates the comments from industry regarding the VAR-002-3 standard. All comments were reviewed carefully by the SDT and changes were made to the standard accordingly. While all comments were reviewed, the new Standards Process Manual (SPM) does not require responses to each individual comment when a successive ballot is needed. However, this document provides a summary of responses to comments. The following pages will provide a summary of the comments received and how the comments were addressed by the VAR SDT. If a specific comment was not addressed in the summary of comments, please contact the NERC Standards Developer or one of the SDT members to discuss.

Duplication

Several commenters suggested that VAR-002-3 duplicated requirements in the TOP and MOD standards, namely TOP-001, TOP-003, and MOD-032. The VAR SDT is very mindful that the TOP-001 and TOP-003 on file with FERC are currently being re-evaluated in a separate project, and the Commission recently recommended a full remand of those standards. There is also an on-going effort to review the TOP/IRO standards, and until those standards have been finalized and approved, the SDT could not rely on those standards as a premise to remove requirements from VAR-002-3. Further, the MOD-032 standard does not apply to Transmission Operators (the entity making the data requests that would precipitate VAR-002 compliance), and the operating horizons are different from the VAR standards. Therefore, the SDT could not remove requirements based on MOD-032 overlap.

A commenter recommended removing Requirement R2 as duplicative of the TOP standards, but as explained above, that was not possible since the TOP standards are currently being reviewed. Further subpart 2.2 requires an explanation for why a voltage schedule cannot be met, and no other standard covers that. In addition, subpart 2.3 provides a caveat that a conversion methodology maybe provided during an audit, and auditor should not use the VAR standard to require high-side monitoring for GOPs. This is also not duplicated in any other standard.

AVR Modes

Some commenters recommended revisions to the standard to allow for multiple voltage control modes. The SDT agreed, and Requirement R1 was revised to allow GOPs to operate with the AVR in-service and in a mode different from “voltage controlling” if instructed by the TOP.

ERCOT RC Functions

Some commenters asked that the standard account for ERCOT nuances where the RC functions like a TOP in other areas. The VAR SDT determined the standard did not need to be modified because in ERCOT, RCs and TOPs have already determined their roles through contractual arrangements.

Deviations from Voltage Schedule

Some commenters recommended providing a minimum threshold for notifications when deviations to voltage schedules occur. The time-frames recommended were rolling averages (30 or 60 minutes), but the VAR SDT could not make these modifications. A smaller window was proposed in the last unsuccessful draft of VAR-002-3, and the industry could not reach a consensus on the right window for the entire continent. Thus, VAR-001-4 was modified to allow the TOPs to set notification timeframes based on the system needs. Also, NERC staff opposed creating too large of non-compliance window due to Reliability concerns.

Exemptions

Some commenters asked for more clarity on what qualifies as an exemption. In VAR-001-4 the TOP may set the exemption criteria for GOPs. TOPs must notify the GOPs when the exemption criteria has been met by the GOPs.

Dispersed Generation

Some commenters asked that VAR-002-3 be amended to account for dispersed generation. However, the VAR SDT is deferring to the Dispersed Generation team currently evaluating standards that would need certain updates. The VAR SDT has provided a copy of the proposed VAR-002 changes to the Dispersed Generation team.

Implementation/Effective Date

One commenter was concerned about the effective date being too soon; however, that commenter did not realize the standard will not go into effect in the United States until the first quarter after regulatory approval. The standard will not go into effect immediately after the approval by the NERC Board of Trustees.

Changing 15 minutes to 30 minutes in Requirements R3 and R4

Some commenters recommended allowing GOPs to have the full 30 minutes to correct a status or reactive capability change, and the VAR SDT agreed that this change will simplify the standard and maintain reliability. Therefore, Requirements R3 and R4 have been amended to allow the full 30 minutes to correct an issue before notifying the TOP.

One commenter also questioned the need for certain status changes. The VAR SDT re-affirmed the need for status change notifications, and the TOPs on the drafting team confirmed they should be notified when an AVR is in service and when it comes back on after an issue in order to know what resources are available in an area.

Requirement R6 Functional Entity

Some commenters questioned why Requirement R6 applies to GOs, while subpart R6.1 applies to GOPs. The VAR SDT agreed and determined that GOs are the appropriate entity for coordinating when a unit is taken offline to make the tap changes. Therefore, subpart R6.1 has been modified to apply to GOs.

VSL

Some commenters recommended changes to the VSLs to add back in time gradations for violations. However, the VAR SDT removed many of the time elements from the VSLs because those timing elements did not have a technical basis and appeared arbitrary.

Telemetry/Notifications

Some commenters asked that telemetry count for compliance purposes when making notifications to the TOP. The notification requirements are set in VAR-001-4, but the standard does not preclude telemetry in any form.

Compliance Input

Comments were received regarding the timing of the posting of a Reliability Standards Audit Worksheet (RSAW). NERC is providing a draft RSAW that will address compliance assessment questions for the draft standard within fifteen days of posting a revised VAR-002-3.

Attachment A – SDT Members Contact Information

	Participant	Entity
Chair	Bill Harm	PJM
Member	Stephen Hitchens	Bonneville Power Authority
Member	Sharma Kolluri	Entergy
Member	Hari Singh	Xcel
Member	Joshua Pierce	Southern Company
Member	Hamid Zakery	Calpine
Observer	Joe Seabrook	Puget Sound Energy
Observer	Scott Berry	Indiana Municipal Power Authority
Observer	Brian Buckley	Tampa Electric Company
Observer	Mike Swearingen	Tri-County Electric Cooperative