Unofficial Comment Form
Project 2013-04 Voltage and Reactive Control (VAR) Revisions

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the draft VAR-002-3 standard. The electronic comment form must be completed by 8:00 p.m. ET by April 14, 2014.

If you have questions please contact Soo Jin Kim via email or by telephone at 404-446-9742.

The project page may be accessed by clicking here.

Background Information
When the first versions of the VAR standards were approved in FERC Order No. 693,1 the Commission also issued FERC issued several directives with regard to how to improve the standard. Each of the outstanding directives are explained in detail in the technical white paper (see project page).

The informal consensus building for VAR began in February 2013. Specifically, the ad hoc group engaged stakeholders on how best to address the FERC directives, remove paragraph 81 candidates, and implement results-based approaches. A discussion of the ad hoc group’s consensus building and collaborative activities are also included in the technical white paper.

Project 2013-04 posted an initial draft for comment and ballot from July 19, 2013 to September 3, 2013. Although the VAR standards did not pass, the industry provided numerous helpful comments, and the standard drafting team made significant revisions based on the stakeholder input. Both VAR-001 and VAR-002 were posted for another comment and ballot from October 11, 2013 to November 26, 2013. VAR-001 successfully passed, but VAR-002 did not receive the necessary votes. This posting is now soliciting comment on the revised VAR-002 standard.

Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

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1 See Mandatory Reliability Standards for the Bulk-Power System, Order No. 693, FERC Stats. & Regs. ¶ 31,242, order on reh’g, Order No. 693-A, 120 FERC ¶ 61,053 (2007).
**Question**

1. Please provide your comments on the proposed VAR-002-3 below:

Comments: Section M1. Add the word "in" to the following sentence: "The Generator Operator shall have evidence to show that it notified its associated Transmission Operator any time it failed to operate a generator in the automatic voltage control mode or in a difference control mode ....."

Footnote 3: suggest rewording the sentence to "The **generator** voltage or Reactive Power schedule is a target value with a tolerance band or a voltage or a Reactive Power range communicated by the Transmission Operator to the Generator Operator."

Footnote 4: suggest rewording the sentence to "A generating Facility's capability may be established by tests or other means, and may not be sufficient at times to **return** the system voltage within the schedule tolerance band...."

Section M2, part 2.3: suggest rewording the sentence to "Generator Operators that do not monitor the voltage at the location specified on the voltage schedule shall document or be able to demonstrate the methodology for converting the scheduled voltage specified by the Transmission Operator to the voltage point being monitored by the Generator Operator."

R3: While we agree with the 30 minute window to allow a GOP time to resolve an issue before having to notify the TOP of a status or capability change, the second part of the sentence seems to negate the first. The GOP has to notify the TOP of a status change within 30 minutes but if the status has been restored within 30 minutes then the GOP is not required to notify the TOP of the status change.

Rationale for R4: typo in the version number of the standard VAR-002-2b.

Section R4: remove the word "then" and "to" in the sentence. Suggest rewording the sentence to "Each Generator Operator shall notify its associated Transmission Operator within 30 minutes of becoming aware of a change in reactive capability due to factors other than a status change described in Requirement R3. If the capability has been restored within the first 30 minutes of such change, the Generator Operator is not required to notify the Transmission Operator of the change in reactive capability".

R1 Severe VSL: for consistency with the wording of the requirement, suggest rewording to "Unless exempted, the Generator Operator did not operate each generator **connected to the interconnected transmission system** in the automatic voltage control mode ...."
R2 Severe VSL: for consistency with the wording of the requirement, suggest adding the word "the" to the sentence: "The Generator Operator did not maintain the voltage or Reactive Power schedule ...." And "The Generator Operator did not modify the voltage when directed ....".

R5 High VSL and Severe VSL: the requirement on page 9 applies to the Generator Owner yet the responsible entity for the VSL is the Generator Operator. The word "Generator Operator" needs to be changed to "Generator Owner".