

Unofficial Comment Form

Project 2021-02 Modifications to VAR-002

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on the **Project 2021-02 Modifications to VAR-002 Standard Authorization Request (SAR)**. Comments must be submitted by **8 p.m. Eastern, Thursday, May 13, 2021**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Laura Anderson](#) (via email), or at 404-446-9671.

Background Information

The Inverter-Based Resource Performance Task Force (IRPTF) developed this SAR to revise VAR-002 to address issues regarding whether the Generator Operator of a dispersed power resource must notify its associated Transmission Operator upon a status change of a voltage controlling device on an individual generating unit; for example, if a single inverter goes offline in a solar photo-voltaic Facility.

NERC Project 2014-01 Standards Applicability for Dispersed Generation Resources revised VAR-002, Requirement R4, to clarify that it is not applicable to individual generating units of dispersed power producing resources. At the time, the IRPTF did not identify any reason why Requirement R3 (i.e., “status change”) should be treated differently than Requirement R4.

The NERC IRPTF undertook an effort to perform a comprehensive review of all NERC Reliability Standards to determine if there were any potential gaps or improvements. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in a white paper¹ approved by the Operating Committee. Among the findings noted in the white paper, the IRPTF identified issues with VAR-002-4.1 that should be addressed through the standards development process.

The SAR was endorsed by the Reliability, Security, and Technology Committee on June 10, 2020 and was accepted and authorized for informal comment posting by the Standards Committee on January 20, 2021.

¹ IRPTF Review of NERC Reliability Standards White Paper, March 2020, approved by the Operating Committee and the Planning Committee in March 2020,
https://www.nerc.com/comm/PC/InverterBased%20Resource%20Performance%20Task%20Force%20IRPT/Review_of_NERC_Reliability_Standards_White_Paper.pdf

Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

Yes

No

Comments:

Please consider revising the SAR to include the recommendations from Project 2016-EPR-02 Enhanced Periodic Review of Voltage and Reactive Standards. Please see Periodic Review Recommendations: VAR-002-4 – Generator Operation for Maintaining Network Voltage Schedules – Attachment 5: Other Miscellaneous Corrections/Revisions.

2. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments: