

Individual or group. (17 Responses)
Name (9 Responses)
Organization (9 Responses)
Group Name (8 Responses)
Lead Contact (8 Responses)
Question 1 (15 Responses)
Question 1 Comments (17 Responses)
Question 2 (17 Responses)
Question 2 Comments (17 Responses)

Group
DTE Electric Co.
Kathleen Black
Yes
No
Group
Northeast Power Coordinating Council
Guy Zito
Yes
For VAR-002-4, the Drafting Team should consider adding start-up and shutdown from footnotes 1 and 2 to the NERC Glossary. For footnote 2 on page 5 suggest replacing "prepared" with "intended". Because the Rationale Boxes stay with the standard after approval, the Drafting Team should consider moving the information in the footnotes to the appropriate Rationale Boxes, and deleting the footnotes.
Group
Arizona Public Service Co
Janet Smith
Yes
No
Individual
Thomas Foltz
American Electric Power
Yes
No
Individual
John Seelke
Public Service Enterprise Group
No
VAR-002-2b(X) The bullet added to subpart 3.1 exempts ALL I4 generators from reporting on their VAR capability status. Not only is this discriminatory to I2 generators, it omits key data for TOPs required to maintain voltage via VAR supply. If the bullet was changed so that changes in AGGREGATE VAR capability for a facility that contains I4 generators was reported, that would be OK;

but it is unacceptable as written. Footnote 5 in R4 is also unacceptable for two reasons. First, it is discriminatory to I2 generators. Second, the modeling of ALL transformers, which consume VARS, will result in less ability for TOPs to correctly model their VAR supply. We also point out that I4 generators are already obligated to comply with the standard without the proposed changes, and no reliability argument has been offered by the SDT that validates the changes proposed. VAR-002-4 The same comments made for VAR-002-2b(X) apply, except that the bullet is in R4 and footnote 5 is in R5. While this standard is not effective, its predecessor, as discussed previously, does require I4 generators to meet the same requirements. No reliability argument has been provided by the SDT to support the change.

Yes

Describe the reliability impacts of proposed changes

Individual

Heather Bowden

EDP Renewables North America LLC

Yes

Yes

Individual

Timothy Brown

Idaho Power

Yes

No

Individual

Michelle D'Antuono

Ingleside Cogeneration LP/Occidental Energy Ventures Corp.

Yes

Occidental Energy Ventures Corp. agrees that the scope of R3.1 and R4 has been appropriately modified to capture the applicable AVRs, PSSs, and transformers located within a dispersed generation facility. There is no good reason to apply BES-level voltage and reactive requirements to individual windmills or solar panels – unless somehow a significant aggregation point is affected. This is unlikely to be the case most of the time, and if every minimal incident is subject to VAR-002-4, both the relay owner and CEA community could be overwhelmed.

No

Individual

Karin Schweitzer

Texas Reliability Entity

Yes

Yes

VAR-002-4 1)Requirements R4 and R5: Texas Reliability Entity, Inc. (Texas RE) requests the SDT make a change to either R4 or R5 regarding placement of exclusion language for consistency. In Requirement R4 the exclusion statement is a bulleted item within the requirement text. In Requirement R5 the exclusion statement is a footnote at the bottom of the page. Texas RE suggests that moving the exclusion language in the requirement language of Requirement R5 is preferable to moving Requirement R4 exclusion language to a footnote. 2)Requirement R5 VSLs: Texas RE requests the SDT consider changing Requirement R5 VSL Levels as follows: Moderate "...one of the types of data..." High "...two of the types of data..." Severe "...all of the types of data..." Changing the VSL language in this manner is consistent with VAR-002-2b(x), Requirement R4 VSL levels. VAR-

002-2b(X) Texas RE suggests a minor change to the Requirement R4 Severe VSL: replace the word "any" with "all" in the first statement. As written, it would appear that a responsible entity failing to provide any one of the types of data would result in a severe VSL instead of the failure to provide all of the types of data. This change would result in the following Severe VSL language: "The Responsible entity failed to provide to its associated Transmission Operator and Transmission Planner all of the types of data as specified in R4.1.1 and R 4.1.2 and 4.1.3 and 4.1.4..."

Group

Colorado Springs Utilities

Kaleb Brimhall

No

We Support the Comments of - Public Service Enterprise Group (PSEG).

Yes

We Support the Comments of - Public Service Enterprise Group (PSEG).

Individual

Jo-Anne Ross

Manitoba Hydro

Yes

No

Group

MRO NERC Standards Review Forum

Joe DePoorter

Yes

Yes

Group

Dominion Resources, Inc.

Randi Heise

Yes

Dominion supports the revisions to R4 and R5 in support of clarity.

Yes

Comments: Dominion believes there should either be a variance in recognition of the WECC regional standards VAR-002-WECC-1 and VAR-501-WECC-1 in this standard or an explanation as to how this continent-wide standard is or is not impacted by those regional standards given all contained requirements relative to actions required to be taken by the Generator Operator when the AVR or PSS is out of service. We suggest the SDT review the current style guide regarding whether to use sub-parts (3.1, 4.1, etc) as opposed to using bullets. Having sub-parts identified make identification of information to communicate.

Individual

Spencer Tacke

Modesto Irrigation District

No

For both VAR-002 proposed modifications, I don't think we should state non-applicability of the Standard for dispersed generation resources identified through Inclusion I4 of the BES definition, as the new addition of "Rationale for Footnote 5" erroneously states (i.e., "as they are not used to improve voltage performance at the point of interconnection", which is simply not true). Some technical reasons for including the smaller generating units are as follows: WECC requires dynamic model verification for all units 20 MVA or larger connected at voltages 60 kV and above. This is because WECC members have learned over the years to recognize the significant role that smaller

size generators play in system response and stability. Also, the WECC MVWG (Modeling and Validation Work Group) is currently performing a study to determine what is the minimum size generator for which model testing and verification needs to be completed. Also, within the next few years, there will be thousands of MWs of PV solar plants on-line in Central California, a large percentage of which will be small, 20 MW plants. We see about 2,500 MW of 20 MW PV units in the queue for the SGIP, SGIP-TC, WDAT, Clusters 1&2, and Clusters 3&4 in California, all coming on-line between now and 2018. Also, past WECC studies over the years of major outages have shown that generators, and indeed loads, below 100 kV, have played a major role in the impact of outages. In fact, the most accurate duplication of the August 1996 outage, and more recent outages that the WECC MVWG has simulated, have shown that the accuracy of the simulated results of actual system outages is highly affected by the accuracy of the modeled system below 100 kV.

No

Group

SPP Standards Review Group

Robert Rhodes

No

Description of Current Draft – Language in this section indicates that VAR-002-3 ‘...was adopted by the NERC Board of Trustees in May 2014 and is pending regulatory approval’. Shouldn’t this be revised to indicate that FERC has now approved VAR-002-3 and it will become effective on October 1, 2014? A similar statement is included in the Rationale Box appearing alongside the Introduction. R3 – Shouldn’t the exception that is being proposed for Requirement R4, also be applied to Requirement R3? Otherwise, the Generator Operator will be required to report status changes for AVRs or other voltage controlling devices for each individual generating unit of a dispersed power producing resource. R4 – In the first line of the bullet under Requirement R4, insert ‘Requirement’ between ‘in’ and ‘R4’. Rationale Box for Exclusion in Requirement R4 – Replace ‘real time’ with the officially recognized term ‘Real-time’ in the last line in the Rationale Box. M5 – To make Measure M5 consistent with the language in Requirement R5, delete ‘transformers’ following ‘its step-up’.

No

Group

ACES Standards Collaborators

Jason Marshall

Yes

We agree with the changes.

Yes

The language adopted in the bullet under Part 3.1 of VAR-002-2b(X) is inconsistent with the August 10, 2009 informational filing NERC submitted to FERC regarding how NERC would begin using a new approach to assign VRFs and VSLs to the main requirement only. In this filing, NERC stated that they would no longer refer to “components” or “sub-parts” of requirements as sub-requirements. Rather, they would be numbered or bulleted lists. Thus, the Requirement R3.1 reference in the bullet under Part 3.1 is inconsistent and should be labeled as Part 3.1.

Individual

Scott Berry

Indiana Municipal Power Agency

Yes

IMPA does not agree with the deletion of the rationales for each requirement on pages 11 and 12. These rationales are used for the previous version of the standard and are still needed in the standard. The additions made by the dispersed generation SDT should not have changed the basis for these rationales. IMPA is fine with adding to them but not deleting all of them.