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)](https://sbs.nerc.net/) 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, Wednesday, April 6, 2022.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2021-02-Modifications-to-VAR-002.aspx). 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 paper[[1]](#footnote-1) 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 and Security Technical Committee on June 10, 2020 and was accepted and authorized for informal comment posting by the Standards Committee on January 20, 2021.

The SAR drafting team has revised the SAR based on comments received by industry:

* The SAR drafting team will be collaborating with the Project 2021-06 (Modifications to IRO-010 and TOP-003) SAR drafting team on the data specification aspects.
* There are ambiguities (as identified by the NERC Inverter-Based Resource Performance Task Force (IRPTF) White Paper - March 2020) that should suitably be addressed within the scope of the SAR.
* The SAR drafting team will recommend that the future SDT conduct a complete review of R1-R6 to fully review IBR considerations.
* To consider the “Project 2016-EPR-02 Enhanced Periodic Review of Voltage and Reactive Standards” recommendations to VAR-002-4 – Generator Operation for Maintaining Network Voltage Schedules in Attachment 5.
* The SAR drafting team has added language to the SAR for consideration of the clarification of applicability to include clear identification of location of voltage control and definition of “generator.”

## 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:

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

Comments:

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> [↑](#footnote-ref-1)