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](https://www.nerc.net/nercsurvey/Survey.aspx?s=a022ae91e3c14eb088aa604386048d42) to submit comments on the draft VAR-001-4 and VAR-002-3 standards. The electronic comment form must be completed by 8:00 p.m. ET by **November 25 , 2013**.

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](http://www.qa.nerc.com/pa/Stand/Pages/Project2013-04VoltageReactiveControl.aspx).

## Background Information

When the first versions of the VAR standards were approved in FERC Order No. 693,[[1]](#footnote-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 form July 19, 2013 to September 3, 2013. Although the VAR standards did not pass, the industry provided numerous helpful coments, and the standard drafting team made significant revisions based on the stakeholder input.

The proposed VAR-001 answers most of the FERC directives from Order No. 693, and the VAR-002 has been modified to address certain compliance issues today. Some directives are not being addressed at this time pending FERC determiniations in related filings, but those directives may be revisted during a phase 2 of this project. This posting is now soliciting comment on the revised VAR-001 and VAR-002 standards.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Question

1. Although FERC directed NERC to provide more details on “established limits,” the VAR standards development team determined that the FAC and TOP standards provide explicit requirements on voltage limits. Further, the definition of a System Operating Limit requires Voltage Stability Ratings (Applicable pre- and post-Contingency Voltage Stability) System Voltage Limits (Applicable pre- and post-Contingency Voltage Limits) to be included. Is it clear that the specifics with regard to voltage limits are to be determined and monitored as part of operating within System Operating Limits and Interconnection Reliability Operating Limits?

[ ]  Yes

[ ]  No

Comments:

2. Several requirements were removed because they duplicated other standards. Do you agree with this approach? Do you have any specific questions or comments relating to the requirements in the revised VAR-001-4?

[ ]  Yes

[ ]  No

Comments:

3. VAR-002 was modified to remove several compliance issues, and in order to address burdensome notification requirements, the VAR-001 standard has been modified to allow each TOP to tailor notification requirements based on system/area needs. Do you agree with these revisions?

[ ]  Yes

[ ]  No

Comments:

4. The VRFs/VSLs for VAR-002 were modified to remove arbitrary time requirements. Do you have any specific comments or questions about the new VSLs/VRFs?

Comments:

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). [↑](#footnote-ref-1)