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maureen.long@nerc.net
 For questions about this form or for assistance in
 completing the form, call Maureen Long at 813-468-5998.

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard	
Date submitted: 1/28/2011	
Contact information for person requesting the interpretation:	
Name:	Amir Hammad
Organization:	Constellation Power Generation
Telephone:	443-677-9762
E-mail:	amir.hammad@constellation.com
Identify the standard that needs clarification:	
Standard Number (include version number):	VAR-002-1.1b
(example: PRC-001-1)	
Standard Title:	Generator Operation for Maintaining Network Voltage Schedules
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement: R1. The Generator Operator shall operate each generator connected to the interconnected transmission system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless the Generator Operator has notified the Transmission Operator.	
Clarification needed: During startup and shutdown of a generator, it is industry practice to have a generator's AVR in the manual mode. Due to the instabilities associated with the changes in the field during these times, it is more reliable to have an operator control the generator than the AVR. Further, an AVR's response is slower and more unreliable when the field current is low, which is the case during start up and shut down. Both the BA and TOP realize that during start up and shut down the real and reactive power from that generator cannot be counted upon for system stability.	
Some regions have taken the stance that during start up and shut down of a generator, it is reasonable to assume that the AVR is in manual and that it will be switched to automatic once stable. This would not require contacting the TOP to state that the AVR is in manual for this time period. Other regions have taken the approach that all status changes of the AVR from automatic, regardless of industry practice and stability, needs to be communicated to the TOP.	
Constellation is seeking clarification of Requirement R1 as to whether or not a communication must be conducted between a GOP and a TOP during start up or shut down of a generator, when the unit is not stable and is not counted upon for real or reactive power by the BA and TOP at that time.	

Identify the material impact associated with this interpretation:

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.

Constellation has found two issues caused by the lack of clarity/incorrect interpretation of this standard:

1. There is not a consistent view across the regions with regard to this requirement. Such inconsistencies are contrary to the intent of NERC's CMEP and can expose entities to inconsistent evaluations. A procedure may be compliant in one region and may not be in another.
2. Requiring a GOP to communicate that the AVR is in manual during start up/shutdown is an unnecessary distraction at a time when the unit is unstable. A generator operator already communicates to the TOP that the unit is being started up or shutting down. Adding another communication imposes a redundant task when the generator operator is focused on controlling the unit and ensuring the reliability of the BES.