



July 9, 2010

Mr. Jerry Mossing
Alberta Electric System Operator
Calgary Place
2500, 330 - 5th Ave SW
Calgary, AB T2P 0L4

Dear Jerry:

**RE: Stakeholder Consultation June 11 to July 9, 2010-07-08
VAR-002-AB-1.1b Generator Operation for Maintaining Network Voltages,
VAR-002-WECC-AB-1 Automatic Voltage Regulators and Voltage Regulating Systems;
and VAR-501-WECC-AB-1 Power System Stabilizer**

ATCO Power (ATCO) appreciates the opportunity to comment on the subject Reliability Standards. In addition to the attached comment matrices, ATCO offers the following overarching remarks:

- VAR-002-1.1b, VAR 002-WECC 1, and VAR-005-WECC-1 are related and discuss the operation of dependent systems. For example, VAR and Pf modes and the PSS are not independent. In our experience all are dependent on the operation of the AVR. The separate standards create confusion and duplication.
- Measurement of the required standards requires further clarification. Some measures reference electronic logs, operator logs and/or voice recordings while others simply state that evidence exist. What degree of detail and references are considered adequate? For example, is the existence of a policy/procedure (with appropriate adherence documented) regarding compliance with a specific standard sufficient evidence? What is an appropriate retention period for compliance related documentation and/or data?
- The requirement to get consent from the Independent System Operator (ISO) to operate in a specific manner is considered redundant. The ISO has the authority to direct units to comply with required parameters and will do so, if required.
- ATCO has reviewed the comments being provided by Capital Power regarding VAR-002-1.1b and VAR-005-WECC-1 and is of the view that these comments have merit.

Should you have questions regarding ATCO's submission, please contact the undersigned.

Regards


Mary Dylke
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