



Stakeholder Comment and Rationale Form

AESO AUTHORITATIVE DOCUMENT PROCESS

**Stakeholder Consultation Draft
2010-06-11**

Alberta Reliability Standard – VAR-002-WECC-AB-1 Automatic Voltage Regulators and Voltage Regulating Systems

NOTE: The AESO is asking market participants to give an initial indication of their support for, or opposition to, the specific Alberta Reliability Standard variances to the NERC requirements referenced below. Such an initial indication assists in the AESO's practical understanding of the receptivity of the industry to the proposed changes, and in that regard the AESO thanks, in advance, all market participants who choose to respond. With regard to the specific standard changes and their implications, such responses are without prejudice to the rights of market participants under the Act, any regulations, or related decisions of the Commission.

Date of Request for Comment [yyyy/mm/dd]: <u>2010-06-11</u> Period of Consultation [yyyy/mm/dd]: <u>2010-06-11</u> through <u>2010-07-09</u> Comments From: <u>Capital Power</u> Date [yyyy/mm/dd]: <u>2010-07-09</u>	Contact: <u>Jerry Mossing</u> Phone: <u>403-539-2496</u> E-mail: <u>ars_comments@ieso.ca</u>
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Listed below is the summary of changes for the proposed new, removed or amended sections of the standard. Please refer back to the Letter of Notice under the "Attachments to Letter of Notice" section to view the proposed content changes to the standard. Please double-click on the check box for either "Support" or "Oppose" and/or place your comments / reasons for position underneath (if any).

1. Definitions	Comments	Rationale and/or Alternate Proposal
(a) New "aggregated generating facilities" means an aggregation of generating units, including any reactive power resources, which are: (i) designated by the ISO; and (ii) situated in the same proximate location at one or more point of connections.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert Comments / Reason for Position (if any)</i>	



1. Definitions	Comments	Rationale and/or Alternate Proposal
<p>“voltage regulating system” means the equipment that automatically controls the reactive power resources to regulate the voltage level at any collector bus.</p>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert Comments / Reason for Position (if any)</i>	
<p>(b) Removals</p>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert Comments / Reason for Position (if any)</i>	
<p>(c) Amendments</p>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert Comments / Reason for Position (if any)</i>	
2. Alberta Reliability Standards	Comments	Rationale and/or Alternate Proposal
<p>(a) New Alberta Variances</p>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert Comments / Reason for Position (if any)</i>	
<p>(b) Removals (Alberta Variances)</p>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert Comments / Reason for Position (if any)</i>	



2. Alberta Reliability Standards	Comments	Rationale and/or Alternate Proposal
<p>(c) Amendments (Alberta Variances)</p> <p>The provisions within the proposed Alberta Reliability Standard <i>VAR-002-AB-1 Automatic Voltage Regulators and Voltage Regulating Systems</i>, are derived from <i>NERC VAR-002-WECC-1</i> with the following amendments. An Alberta variance is a change from the NERC Reliability Standard that the AESO has determined is material.</p> <p>The following revisions have been made throughout this proposed reliability standard:</p> <ul style="list-style-type: none"> - Identified the responsible entities in Alberta. - Applied a consistent writing style and added clarity. - Changed passive terms such as “shall” to “must”. - Developed measures specific to the requirements. <p>Specifically, the following provisions are deemed as Alberta variances and have amended the existing NERC VAR-002-WECC-1 requirements.</p>		
<p>R1. Each operator of a synchronous generating unit, wind aggregated generating facility and each TFO that operates a synchronous condenser, must have the automatic voltage regulator or voltage regulating system in service and in automatic voltage control mode, 98% of all operating hours provided that the foregoing requirement does not apply to the extent of any of the circumstances determined in accordance with requirements R1.1 to R1.10 inclusive.</p> <p>R1.1 The operating hours during which the synchronous generating unit, wind aggregated generating facilities or synchronous condenser operates for less than five per cent of all hours during any calendar quarter.</p> <p>R1.2. The operating hours during which maintenance or testing on any of the foregoing was performed, up to a maximum of seven calendar days per calendar quarter.</p> <p>R1.3 The operating hours during which the automatic voltage regulator or voltage regulating system exhibits instability due to abnormal system configuration.</p> <p>R1.4 The operating hours up to a maximum of 60 consecutive days per incident, during which the automatic voltage regulator or voltage regulating system is out of service for repair due to component failure.</p> <p>R1.5 The operating hours up to one year during which the automatic</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert Comments / Reason for Position (if any)</i></p>	



2. Alberta Reliability Standards	Comments	Rationale and/or Alternate Proposal
<p>voltage regulator or voltage regulating system had a component failure, provided the operator of a generating unit, wind aggregated generating facility or TFO submitted documentation to the ISO identifying the need for time to obtain replacement parts and if required, to schedule an outage.</p> <p>R1.6 The operating hours up to 24 months during which the automatic voltage regulator or voltage regulating system had a component failure, provided the operator of a generating unit, wind aggregated generating facility or TFO submitted documentation to the ISO identifying the need for time for excitation system replacement (replace the automatic voltage regulator or voltage regulating system, limiters, and controls but not necessarily the power source and power bridge) and to schedule an outage.</p> <p>R1.7 The operating hours during which the synchronous generating unit, wind aggregated generating facility or synchronous condenser has not achieved commercial operation.</p> <p>R1.8 The operating hours during which the ISO directs the operator of a synchronous generating unit or wind aggregated generating facility to operate the synchronous generating unit or wind aggregated generating facility and the automatic voltage regulator or voltage regulating system is unavailable for service.</p> <p>R1.9 The operating hours during which the ISO directs a TFO to operate a synchronous condenser, and the automatic voltage regulator is unavailable for service.</p> <p>R1.10 The operating hours during which an automatic voltage regulator or voltage regulating system exhibits instability due to operation of a on-load tap changer transformer in the area and the ISO authorized the operator of a generating unit, wind aggregated generating facility or TFO for synchronous condensers to operate the excitation system in modes other than automatic voltage control until the system configuration changes.</p>		
<p>R2 Each operator of a generating unit, wind aggregated generating facility and TFO must have documentation identifying the number of hours excluded for each requirement in requirement R1.1 through R1.10.</p>	<p><input type="checkbox"/> Support</p> <p><input type="checkbox"/> Support with language suggestions</p> <p><input type="checkbox"/> Oppose</p> <p><i>Insert Comments / Reason for Position (if any)</i></p>	



2. Alberta Reliability Standards	Comments	Rationale and/or Alternate Proposal
<p>(d) Other <i>(Stakeholders wishing to comment on specific provisions are requested to copy the provision into this area and provide comments)</i></p>	<p>Double Jeopardy concern – OPP 1305 Section 4.2, and Item 14 on Tables 1, 2 and 3 specify identical requirements to those contained in this standard.</p> <p>We raised this issue with regard to CIP-001 and OPP 808 and it is our view that Market participants should not be put at risk of being found non-compliant with multiple authoritative documents for a single action or inaction. Capital Power does not support the approval of this standard without the simultaneous removal of these provisions from OPP 1305.</p>	