

## Request for Interpretation of NERC Standard VAR-002-1

Dated January 24, 2007

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Requirement R1 of Standard VAR-002-1 states that Generation Operators 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.

Requirement R2 goes on to state that each Generation Operator shall maintain the generator voltage *or Reactive Power output* as directed by the Transmission Operator.

The two underlined phrases are the reasons for this interpretation request.

Most generation excitation controls include a device known as the Automatic Voltage Regulator, or AVR. This is the device which is referred to by the R1 requirement above. Most AVR's have the option of being set in various operating modes, such as constant voltage, constant power factor, and constant Mvar.

In the course of helping members of the WECC insure that they are in full compliance with NERC Reliability Standards, I have discovered both Transmission Operators and Generation Operators who have interpreted this standard to mean that AVR operation in the constant power factor or constant Mvar modes complies with the R1 and R2 requirements cited above. Their rationale is as follows:

- The AVR is clearly in service because it is operating in one of its operating modes
- The AVR is clearly controlling voltage because to maintain constant PF or constant Mvar, it controls the generator terminal voltage
- R2 clearly gives the Transmission Operator the option of directing the Generation Operator to maintain a constant reactive power output rather than a constant voltage.

Other parties have interpreted this standard to require operation in the constant voltage mode only. Their rationale stems from the belief that the purpose of the VAR-002-1 standard is to insure the automatic delivery of additional reactive to the system whenever a voltage decline begins to occur.

The material impact of misinterpretation of these standards is twofold.

- First, misinterpretation may result in reduced reactive response during system disturbances, which in turn may contribute to voltage collapse.
- Second, misinterpretation may result in substantial financial penalties imposed on generation operators and transmission operators who believe that they are in full compliance with the standard.

In accordance with the NERC Reliability Standards Development Procedure, I am requesting that a formal interpretation of the VAR-002-1 standard be provided. Two specific questions need to be answered.

- First, does AVR operation in the constant PF or constant Mvar modes comply with R1?
- Second, does R2 give the Transmission Operator the option of directing the Generation Owner to operate the AVR in the constant Pf or constant Mvar modes rather than the constant voltage mode?

### **Interpretation of NERC Standard VAR-002-1**

**Prepared by Phase 3&4 Standard Drafting Team Members**

**Dated March 5, 2007**

**In response to February 2007 request from**

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### **Questions and Answers**

The answers to the two questions posed by Mr. John H. Stout are:

1. Question: First, does AVR operation in the constant PF or constant Mvar modes comply with R1?

Answer: No, only operation in constant voltage mode meets this requirement. This answer is predicated on the assumption that the generator has the physical equipment that will allow such operation and that the Transmission Operator has not directed the generator to run in a mode other than constant voltage.

2. Question: Second, does R2 give the Transmission Operator the option of directing the Generation Owner (sic) to operate the AVR in the constant Pf or constant Mvar modes rather than the constant voltage mode?

Answer: Yes, if the Transmission Operator specifically directs a Generator Operator to operate the AVR in a mode other than constant voltage mode, then that directed mode of AVR operation is allowed.

### **Background and Discussion**

Requirement R1 of Standard VAR-002-1 states that Generation Operators 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.

Requirement R1 clearly states controlling voltage. This can only be accomplished by using the automatic voltage control mode. Using the Power Factor (PF) or constant MVAR control is not a true method to control voltage even though they may have some effect on voltage. This is the baseline mode of operation that is clearly conditioned by “unless the Generator Operator has notified the Transmission Operator”. The following Requirement R2 introduces the possibility of an exemption to this baseline mode of operation discussed below.

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The above interpretation is further reinforced by reviewing the origin of the requirement. The current Requirement R1 is an evolution of the words in the associated source document, namely NERC Planning Standards Compliance Template for III.C.M1, “Operation of all synchronous generators in the automatic voltage control mode”.

As stated in the original III.C.S1 Standard:

**“All synchronous generators connected to the interconnected transmission systems shall be operated with their excitation system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless approved otherwise by the transmission system operator.”**

Requirement R2 of Standard VAR-002-1 goes on to state that “Unless exempted by the Transmission Operator, each Generator Operator shall maintain the generator voltage or Reactive Power output (within applicable Facility Ratings) as directed by the Transmission Operator.” The purpose of this requirement is to give the Transmission Operator the ability to direct the Generator Operator to use another mode of operation. This ability may be necessary based on the Transmission Operator’s system studies and/or knowledge of system conditions. This ability also gives the Transmission Operator the latitude to work with the Generator Operator who has a generating unit that lacks the physical equipment to be able to run in the automatic voltage control mode or has contractual requirements to operate in a certain manner.

Both Requirements R1 and R2 in VAR-002-1 were worded such that they coordinate with Requirement R4 in VAR-001-1:

“Each Transmission Operator shall specify a voltage or Reactive Power schedule at the interconnection between the generator facility and the Transmission Owner's facilities to be maintained by each generator. The Transmission Operator shall provide the voltage or Reactive Power schedule to the associated Generator Operator and direct the Generator Operator to comply with the schedule in automatic voltage control mode (AVR in service and controlling voltage). “

Again this Requirement R4 reflects that the baseline mode of operation is to use the automatic voltage control mode with the option for the Transmission Operator to specify other modes of operation as dictated by system studies and needs to maintain system reliability.