

Proposed New VAR-002-AB-4.1 — Generator Operation for Maintaining Network Voltage



Date of Request for Comment: <u>February 9, 2021</u>	Contact: <u>Mary-Beth Hansen</u>
Period of Comment: <u>February 9, 2021</u> through <u>February 26, 2021</u>	Phone: <u>403-689-0321</u>
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Date [yyyy/mm/dd]: <u>2021/02/25</u>	

Instructions:

1. Please fill out the section above as indicated.
2. Please refer to the Consultation Letter under the “Attachments” section to view materials related to the proposed new VAR-002-AB-4.1 — Generator Operation for Maintaining Network Voltage.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>New</p> <ol style="list-style-type: none"> 1. Are there any requirements contained in proposed new VAR-002-AB-4.1 that are not clearly articulated? If yes, please indicate the specific section of proposed new VAR-002-AB-4.1, describe the concern and suggest alternative language. 2. Do you have any additional comments regarding proposed new VAR-002-AB-4.1? If yes, please specify. 	<p><i>R1 (b). ENMAX supports this change, as it allows for unplanned or forced outages to occur, based on the notifications required under R3.</i></p> <p>EEC Question 1:</p> <p>R1 states: The operator of a generating unit and the operator of an aggregated generating facility must, while a generating unit or aggregated generating facility is electrically connected to the transmission system, operate the generating unit or aggregated generating facility with its automatic voltage regulator or voltage regulating system in service and in automatic voltage control mode, or in a different control mode as instructed by the ISO unless;</p> <ul style="list-style-type: none"> • Why is electrically connected to the transmission system required? If a unit is not operating (no MW's being generated) but still electrically connected, is there a need to validate whether the Automatic Voltage Regulator (AVR) or Voltage Regulating System (VRS) remains in-service and in voltage control mode? <p>EEC proposes the following wording:</p> <ul style="list-style-type: none"> • The operator of a generating unit and the operator of an aggregated generating facility must operate the generating unit or aggregated generating facility with its automatic voltage regulator or voltage

regulating system in service and in automatic voltage control mode, or in a different control mode as instructed by the ISO unless;

EEC Question 2:

R1 states that the facilities must operate the generating unit or aggregated generating facility with its automatic voltage control regulator or voltage regulating system **in service and in automatic voltage control mode**, unless:

R1(b) states that unless the operator has notified the ISO in accordance with R3 that the generating unit or aggregated generating facility is not being operated in **automatic voltage control mode**...”.

- EEC would like to confirm that R1(b) includes situations where the automatic voltage regulator or voltage regulating system is not “in-service”.

R1 includes **in-service and in automatic voltage control mode**, but R1(b) only includes **automatic voltage control mode** (it does not include in-service).

For example, if the AVR or VRS encounters an unplanned outage, where it is not in-service, is this included in R1(b) (assuming the notification to the ISO was completed as per R3)?

EEC Question 3:

R1(b) states “Such reasons may include a forced or unplanned change in control mode.”

- Does change in control mode, include change from in-service to out of service?

EEC Question 4:

Requirement 3: ENMAX supports this change, as it allows for 30-minute notifications that include a status or control mode change.

- Can the AESO provide clarity on what change in “control mode” means and what a “status change” means.