

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

Date of Request for Comment:	February 9, 2021	Contact:	<u>Karen Bailey</u>
Period of Comment:	February 9, 2021 through February 26, 2021	Phone:	<u>587.943.1022</u>
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Date [yyyy/mm/dd]:	February 25, 2021		

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><u>R1 and R3</u></p> <p>For version 3 of this standard (VAR-002-AB-3), the AESO’s interpretation of R1 and R3 is that, despite <u>not</u> requiring notification of an AVR status change under R3.1 if the AVR status is restored within 30 minutes, the less than 30-minute change in status is still considered to be a violation of R1. This means that any forced or unplanned change in AVR status automatically results in a contravention of R1.</p> <p>The only possible exception to R1 in version 3 that could apply for a forced or unplanned change in AVR status is R1b) which states: “<i>the operator ...provides voice notification to the ISO of its intention to operate the generating unit or aggregated generating facility otherwise.</i>”. The AESO however interprets “intention” to mean “planned” and therefore notification of a forced or unplanned AVR status change is not considered as an exception to R1.</p>

In this new version 4.1 (VAR-002-AB-4.1), R1 states, that the AVR must be in the proper mode while connected to the grid unless:

“R1(b) - the operator of a generating unit or operator of an aggregated generating facility has notified the ISO in accordance with requirement R3 that the generating unit or aggregated generating facility is not being operated in automatic voltage control mode or in the control mode that was instructed by the ISO for a reason other than start-up, shutdown, or testing. Such reasons may include a forced or unplanned change in control mode;

Requirement 3.1 states: *If the status or control mode has been restored within 30 minutes of such change, then the operator of a generating unit or operator of an aggregated generating facility is not required to notify the ISO of the status or control mode change.*

Heartland Generation Ltd. requests that the ISO confirms that the changes to R1b) is interpreted as follows:

- 1) There is no violation of R1 if the ISO is notified of a change in AVR status within 30 minutes of a change that lasts longer than 30 minutes.
- 2) Notification to the ISO is not required for a change in AVR status of less than 30 minutes AND there would be no violation of R1.

If the above interpretation is correct, Heartland Generation Ltd. has no further comment – please confirm.

If the ISO’s interpretation differs from the above, Heartland Generation Ltd., requests that the ISO provides clear statements as to the intent of the changes to exception R1b) and whether or not there is a violation of R1 if:

- 1) The ISO is notified within 30 minutes of change of AVR status that lasts longer than 30 minutes.
- 2) AVR status is restored within 30 minutes with no notification.