

Comparison Rationale Matrix

2021-02-09

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard –VAR-002-AB-4.1 — Generator Operation for Maintaining Network Voltages

NERC VAR-002-4.1	Current Alberta VAR-002-AB-3	New Alberta VAR-002-AB-4.1	Alberta Variances, Reason for Differences and Comments
<p>Purpose</p> <p>To ensure generators provide reactive support and voltage control, within generating Facility capabilities, in order to protect equipment and maintain reliable operation of the Interconnection.</p>	<p>Purpose</p> <p>To ensure generating units and aggregated generating facilities provide reactive support and voltage control, within generating facility capabilities, in order to protect equipment and maintain reliable operation of the Interconnection.</p>	<p>Purpose</p> <p><u>The purpose of this reliability standard is to</u> ensure generating units and aggregated generating facilities provide reactive support and voltage control, within generating facility capabilities, in order to protect equipment and maintain reliable operation of the <u>interconnected electric system</u>Interconnection.</p>	<p><i>Marked changes in column 1, NERC VAR-002-4.1, indicate amendments from NERC version 3 to version 4. There were no material changes made to requirements by NERC in moving from version 4 to version 4.1;</i></p> <p><i>Marked changes in column 3, Alberta version 4.1, show proposed amendments from column 2, Alberta version 3.</i></p> <p>Reason for Difference: The Alberta version of this standard addresses maintaining the reliable operation of the interconnected electric system in accordance with the AESO’s mandate under the Electric Utilities Act.</p>

<p>Applicability</p> <p>4.1. Generator Operator</p> <p>4.2. Generator Owner</p>	<p>Applicability</p> <p>This reliability standard applies to:</p> <ul style="list-style-type: none"> (a) the legal owner of a generating unit, including a generating unit that operates as a synchronous condenser, that: <ul style="list-style-type: none"> (i) is not part of an aggregated generating facility; (ii) has a maximum authorized real power rating greater than 4.5 MW; and (iii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat; (b) the operator of a generating unit, including a generating unit that operates as a synchronous condenser, that: <ul style="list-style-type: none"> (i) is not part of an aggregated generating facility; (ii) has a maximum authorized real power rating greater than 4.5 MW; and (iii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat; 	<p>Applicability</p> <p>This reliability standard applies to:</p> <ul style="list-style-type: none"> (a) the legal owner of a generating unit, including a generating unit that operates as a synchronous condenser, that has a maximum authorized real power greater than or equal to 5 MW and where the generating unit is: <ul style="list-style-type: none"> (i) is not part of an aggregated generating facility; connected to a switchyard at which system access service is provided to: <ul style="list-style-type: none"> (A) the generating unit; or (B) an industrial complex of which the generating unit is a part; or (ii) has a maximum authorized real power rating greater than 4.5 MW; and directly connected to transmission facilities within the City of Medicine Hat; (iii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat; (b) the operator of a generating unit, including a generating unit that operates as a synchronous condenser, that has a maximum authorized real power greater than or equal to 5 MW and where the generating unit is: <ul style="list-style-type: none"> (i) is not part of an aggregated generating facility; connected to a switchyard at which system access service is provided to: <ul style="list-style-type: none"> (A) the generating unit; or (B) an industrial complex of which the generating unit is a part; or (ii) has a maximum authorized real power rating greater than 4.5 MW; and directly 	<p>Reason for Difference: The AESO is recommending to change the threshold of the size of the generating resources included in the applicability section of VAR-002-AB-4.1 from a MARP of 4.5 MW to 5 MW to establish consistency with the ISO rules that apply to generating resources at this level.</p>
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	<p>(c) the legal owner of an aggregated generating facility that:</p> <ul style="list-style-type: none"> (i) has a maximum authorized real power rating greater than 4.5 MW; and (ii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat; and <p>(d) the operator of an aggregated generating facility that:</p> <ul style="list-style-type: none"> (i) has a maximum authorized real power rating greater than 4.5 MW; and (ii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat. <p>Notwithstanding subsections (c) and (d) above, this</p>	<p>connected to transmission facilities within the City of Medicine Hat;</p> <p>(iii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat;</p> <p>(c) the legal owner of an aggregated generating facility that <u>has a maximum authorized real power greater than or equal to 5 MW and is:</u></p> <ul style="list-style-type: none"> (i) has a maximum authorized real power rating greater than 4.5 MW; and <u>connected to a switchyard at which system access service is provided to:</u> <ul style="list-style-type: none"> <u>(A) the aggregated generating facility; or</u> <u>(B) an industrial complex of which the aggregated generating facility is a part; or</u> (ii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat; and <p>(d) the operator of an aggregated generating facility that <u>has a maximum authorized real power greater than or equal to 5 MW and is:</u></p> <ul style="list-style-type: none"> (i) has a maximum authorized real power rating greater than 4.5 MW; and <u>connected to a</u> 	

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	<p>reliability standard does not apply to the legal owner of an aggregated generating facility or the operator of an aggregated generating facility that meets the criteria listed in Appendix 1 of VAR-001-AB.</p>	<p><u>switchyard at which system access service is provided to:</u></p> <p><u>(A) the aggregated generating facility; or</u></p> <p><u>(B) an industrial complex of which the aggregated generating facility is a part; or</u></p> <p>(ii) is directly connected to either the transmission system or to transmission facilities within the City of Medicine Hat; and.</p> <p>Notwithstanding subsections (c) and (d) above, this reliability standard does not apply to the legal owner of an aggregated generating facility or the operator of an aggregated generating facility that meets the criteria listed in Appendix 1 of VAR-001-AB.</p>	

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NERC VAR-002-4.1	Current Alberta VAR-002-AB-3	New Alberta VAR-002-AB-4.1	Alberta Variances, Reason for Differences and Comments
<p>Effective Date See Implementation Plan.</p>	<p>Effective Date 2016-04-01</p>	<p>Effective Date Upon approval by the Commission</p>	

<p>R1 The Generator Operator shall operate each generator connected to the interconnected transmission system in the automatic voltage control mode (with its automatic voltage regulator (AVR) in service and controlling voltage) or in a different control mode as instructed by the Transmission Operator unless: 1) the generator is exempted by the Transmission Operator, or 2) the Generator Operator has notified the Transmission Operator of one of the following: <i>[Violation Risk Factor: Medium]</i> <i>[Time Horizon: Real-time Operations]</i></p> <ul style="list-style-type: none"> • That the generator is being operated in start-up,¹ shutdown,² or testing mode pursuant to a Real-time communication or a procedure that was previously provided to the Transmission Operator; or • That the generator is not being operated in automatic voltage control mode or in the control mode that was instructed by the Transmission Operator for a reason other than start-up, shutdown, or testing. 	<p>R1 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 voltage control mode unless:</p> <ol style="list-style-type: none"> a) exempted by the ISO; b) the operator of the generating unit or operator of the aggregated generating facility provides voice notification to the ISO of its intention to operate the generating unit or aggregated generating facility otherwise; c) the generating unit or aggregated generating facility is being operated in start-up or shut-down mode in accordance with the procedure of the operator of a generating unit or operator of an aggregated generating facility; or d) the operator of a generating unit or the operator of an aggregated generating facility has previously obtained approval from the ISO allowing the generating unit 	<p>R1 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, <u>or in a different control mode as instructed by the ISO</u> unless:</p> <ol style="list-style-type: none"> a) exempted by the ISO <u>the generating unit or aggregated generating facility is exempted by the ISO</u>; b) the operator of the a <u>generating unit</u> or operator of the an <u>aggregated generating facility</u> provides voice notification to the ISO of its intention to operate the generating unit or aggregated generating facility otherwise <u>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</u>; c) the generating unit or aggregated generating facility is being operated in <u>during</u> start-up or shut-down mode <u>in</u> accordance with the procedure of the operator of a generating unit or operator of an aggregated generating facility; or d) the operator of a generating unit or the operator of an aggregated generating facility has previously obtained approval from the ISO allowing the generating unit or 	<p>Alberta Variance: Amended requirement R1(b) to not require notification to the AESO when the control mode of the automatic voltage regulator, voltage regulating system or alternative voltage controlling device has been restored within 30 minutes. The notification required is to be made in accordance with requirement R3.</p>
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	or aggregated generating facility to be in a testing mode.	aggregated generating facility to be in a testing mode.	

¹ 1 Start-up is deemed to have ended when the generator is ramped up to its minimum continuously sustainable load and the generator is prepared for continuous operation.

² 2 Shutdown is deemed to begin when the generator is ramped down to its minimum continuously sustainable load and the generator is prepared to go offline.

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<p>M1 The Generator Operator shall have evidence to show that it notified its associated Transmission Operator any time it failed to operate a generator in the automatic voltage control mode or in a different control mode as specified in Requirement R1. If a generator is being started up or shut down with the automatic voltage control off, or is being tested, and no notification of the AVR status is made to the Transmission Operator, the Generator Operator will have evidence that it notified the Transmission Operator of its procedure for placing the unit into automatic voltage control mode as required in Requirement R1. Such evidence may include, but is not limited to, dated evidence of transmittal of the procedure such as an electronic message or a transmittal letter with the procedure included or attached. If a generator is exempted, the Generator Operator shall also have evidence that the generator is exempted from being in automatic voltage control mode (with its AVR in service and controlling voltage).</p>	<p>M1 Evidence of operating the generating unit or aggregated generating facility in automatic voltage control mode as required in requirement R1 exists. Evidence may include, but is not limited to, exemption letters, data files, start-up or shut-down procedures, operator logs, voice recordings, e-mail, or other equivalent evidence.</p>	<p>MR1 Evidence of operating the generating unit or aggregated generating facility in automatic voltage control mode as required in requirement R1 exists. Evidence may include, but is not limited to, exemption letters, data files, start-up or shut-down procedures, operator logs, voice recordings, e-mail, or other equivalent evidence.</p>	

<p>R2 Unless exempted by the Transmission Operator, each Generator Operator shall maintain the generator voltage or Reactive Power schedule³ (within each generating Facility’s capabilities⁴) provided by the Transmission Operator, or otherwise shall meet the conditions of notification for deviations from the voltage or Reactive Power schedule provided by the Transmission Operator. [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]</p> <p>2.1. When a generator’s AVR is out of service or the generator does not have an AVR, the Generator Operator shall use an alternative method to control the generator reactive output to meet the voltage or Reactive Power schedule provided by the Transmission Operator.</p> <p>2.2. When instructed to modify voltage, the Generator Operator shall comply or provide an explanation of why the schedule cannot be met.</p> <p>2.3. Generator Operators that do not monitor the voltage at the location specified in their voltage schedule shall have a methodology for converting the scheduled voltage specified by the Transmission Operator to the voltage point being monitored by the Generator Operator.</p>	<p>R2 Unless exempted by the ISO, each operator of a generating unit and each operator of an aggregated generating facility must, upon receiving an instruction from the ISO regarding voltage levels or reactive power, comply with that instruction.</p> <p>R2.1 Each operator of a generating unit and each operator of an aggregated generating facility must, when:</p> <p>a) the automatic voltage regulator of a generating unit or the voltage regulating system of an aggregated generating facility is out of service; or</p> <p>(b) the generating unit does not have an automatic voltage regulator, or the aggregated generating facility does not have a voltage regulating system,</p> <p>use an alternative method to control the generator reactive output to comply with an instruction from the ISO regarding voltage levels or reactive power.</p> <p>R2.2 Notwithstanding requirement R2, where the operator of a generating unit or the operator of an aggregated generating facility cannot comply with an instruction to modify voltage, the operator of a generating unit or the operator of an aggregated generating facility must provide an explanation for why the instruction cannot be met.</p> <p>R2.3 Each operator of a generating unit and operator of an aggregated generating facility that does not monitor the voltage or reactive power at the location specified in an</p>	<p>R2 Unless exempted by the ISO, each operator of a generating unit and each operator of an aggregated generating facility must, upon receiving an instruction from the ISO regarding voltage levels or reactive power, comply with that instruction.</p> <p>R2.1 Each operator of a generating unit and each operator of an aggregated generating facility must, when:</p> <p>a) the automatic voltage regulator of a generating unit or the voltage regulating system of an aggregated generating facility is out of service; or</p> <p>(b) the generating unit does not have an automatic voltage regulator, or the aggregated generating facility does not have a voltage regulating system,</p> <p>use an alternative method to control the generator reactive power output to comply with an instruction from the ISO regarding voltage levels or reactive power.</p> <p>R2.2 Notwithstanding requirement R2, where the operator of a generating unit or the operator of an aggregated generating facility cannot comply with an instruction to modify voltage, the operator of a generating unit or the operator of an aggregated generating facility must provide an explanation for why the instruction cannot be met.</p> <p>R2.3 Each operator of a generating unit and operator of an aggregated generating facility that does not monitor the voltage or</p>	
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	<p>instruction from the ISO, or at the location specified in a directive issued by the ISO in accordance with section 301.2 of the ISO rules, ISO Directives, must have a methodology for converting the voltage or reactive power at the location specified by the ISO.</p>	<p>reactive power at the location specified in an instruction <u>or directive</u> from the ISO or at the location specified in a directive issued by the ISO in accordance with section 301.2 of the ISO rules, ISO Directives, must have a methodology for converting the voltage or reactive power at the location specified by the ISO.</p>	

³ The voltage or Reactive Power schedule is a target value with a tolerance band or a voltage or Reactive Power range communicated by the Transmission Operator to the Generator Operator.

⁴ Generating Facility capability may be established by test or other means, and may not be sufficient at times to pull the system voltage within the schedule tolerance band. Also, when a generator is operating in manual control, Reactive Power capability may change based on stability considerations

<p>M2 In order to identify when a generator is deviating from its schedule, the Generator Operator will monitor voltage based on existing equipment at its Facility. The Generator Operator shall have evidence to show that the generator maintained the voltage or Reactive Power schedule provided by the Transmission Operator, or shall have evidence of meeting the conditions of notification for deviations from the voltage or Reactive Power schedule provided by the Transmission Operator. Evidence may include, but is not limited to, operator logs, SCADA data, phone logs, and any other notifications that would alert the Transmission Operator or otherwise demonstrate that the Generator Operator complied with the Transmission Operator's instructions for addressing deviations from the voltage or Reactive Power schedule. For Part 2.1, when a generator's AVR is out of service or the generator does not have an AVR, a Generator Operator shall have evidence to show an alternative method was used to control the generator reactive output to meet the voltage or Reactive Power schedule provided by the Transmission Operator. For Part 2.2, the Generator Operator shall have evidence that it complied with the Transmission Operator's instructions to modify its voltage or provided an explanation to the Transmission Operator of why the Generator Operator was unable to comply with the instruction. Evidence may include, but is not limited to, operator logs, SCADA data, and phone logs. For Part 2.3, for Generator Operators that do not monitor the voltage at the location specified on the voltage schedule, the Generator Operator shall demonstrate the methodology for</p>	<p>MR2 Evidence of complying with an instruction as required in requirement R2 exists. Evidence may include, but is not limited to, data files or operator logs.</p> <p>MR 2.1 Evidence of using an alternative method to control generator reactive power output as required in requirement R2.1 exists. Evidence may include, but is not limited to, data files, operator logs or voice recordings.</p> <p>MR 2.2 Evidence of providing an explanation to the ISO, as required in requirement R2.2 exists. Evidence may include, but is not limited to, voice recordings or operator logs.</p> <p>MR 2.3 Evidence of having a methodology as required in requirement R2.3 exists. Evidence may include, but is not limited to, a documented methodology or other equivalent evidence.</p>	<p>MR2 Evidence of complying with an instruction as required in requirement R2 exists. Evidence may include, but is not limited to, data files, or operator logs, <u>or other equivalent evidence</u>.</p> <p>MR2.1 Evidence of using an alternative method to control generator reactive power output as required in requirement R2.1 exists. Evidence may include, but is not limited to, data files, operator logs, or voice recordings, <u>or other equivalent evidence</u>.</p> <p>MR2.2 Evidence of providing an explanation to the ISO, as required in requirement R2.2 exists. Evidence may include, but is not limited to, voice recordings, or operator logs, <u>or other equivalent evidence</u>.</p> <p>MR2.3 Evidence of having a methodology as required in requirement R2.3 exists. Evidence may include, but is not limited to, a documented methodology, or other equivalent evidence.</p>	
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<p>converting the scheduled voltage specified by the Transmission Operator to the voltage point being monitored by the Generator Operator.</p>			
<p>R3 Each Generator Operator shall notify its associated Transmission Operator of a status change on the AVR, power system stabilizer, or alternative voltage controlling device within 30 minutes of the change. If the status has been restored within 30 minutes of such change, then the Generator Operator is not required to notify the Transmission Operator of the status change. <i>[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]</i></p>	<p>R3 Each operator of a generating unit and operator of an aggregated generating facility must notify the ISO within thirty (30) minutes after a status change of the automatic voltage regulator, voltage regulating system or alternative voltage controlling device and power system stabilizer, as applicable, on any generating unit or aggregated generating facility.</p> <p>R3.1 If the status has been restored within thirty (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 change.</p> <p>R3.2 If a generating unit or an aggregated generating facility is in testing, start-up, shut-down or offline mode, requirement R3 does not apply.</p>	<p>R3 Each operator of a generating unit and operator of an aggregated generating facility must notify the ISO within 30 minutes after a status <u>or control mode</u> change of the automatic voltage regulator, voltage regulating system or alternative voltage controlling device and power system stabilizer, as applicable, on any generating unit or aggregated generating facility.</p> <p>R3.1 If the status <u>or control mode</u> 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 <u>or control mode</u> change.</p> <p>R3.2 If a generating unit or an aggregated generating facility is in testing, start-up, shut-down or offline mode, requirement R3 does not apply.</p>	<p>Alberta Variance: Included reference to control mode in Requirement R3, to align with the amendment made to Requirement R1(b).</p>
<p>M3 The Generator Operator shall have evidence it notified its associated Transmission Operator within 30 minutes of any status change identified in Requirement R3. If the status has been restored within the first 30 minutes, no notification is necessary.</p>	<p>MR3 Evidence of notifying the ISO within thirty (30) minutes of any status change as required in requirement R3 exists. Evidence may include, but is not limited to, data logs, SCADA logs, voice recordings or operator logs.</p>	<p>MR3 Evidence of notifying the ISO within 30 minutes of any status <u>or control mode</u> change as required in requirement R3 exists. Evidence may include, but is not limited to, data logs, SCADA logs, voice recordings, or operator logs, <u>or other equivalent evidence</u>.</p>	

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<p>R4 Each Generator Operator shall notify its associated Transmission Operator within 30 minutes of becoming aware of a change in reactive capability due to factors other than a status change described in Requirement R3. If the capability has been restored within 30 minutes of the Generator Operator becoming aware of such change, then the Generator Operator is not required to notify the Transmission Operator of the change in reactive capability. <i>[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]</i></p> <p><u>• Reporting of status or capability changes as stated in Requirement R4 is not applicable to the individual generating units of dispersed power producing resources identified through Inclusion I4 of the Bulk Electric System definition.</u></p>	<p>R4 Each operator of a generating unit and operator of an aggregated generating facility must notify the ISO within thirty (30) minutes after becoming aware of a change in reactive capability due to factors other than a status change described in requirement R3.</p> <p>R4.1 If the capability has been restored within thirty (30) minutes of the operator of a generating unit or operator of an aggregated generating facility becoming aware of such change, then the operator is not required to notify the ISO of the change in reactive capability.</p> <p>R4.2 If a generating unit or an aggregated generating facility is in testing, start-up, shut-down or offline mode, requirement R4 does not apply.</p>	<p>R4 Each operator of a generating unit and operator of an aggregated generating facility must notify the ISO within (30) minutes after becoming aware of a change in reactive power capability due to factors other than a status <u>or control mode</u> change described in requirement R3, <u>or unless:</u></p> <p>R4.1 If the capability has been restored within (30) minutes of the operator of a generating unit or operator of an aggregated generating facility becoming aware of such change, then the operator is not required to notify the ISO of the change in reactive power capability; <u>or</u></p> <p>R4.2 If a generating unit or an aggregated generating facility is in testing, start-up, shut-down or offline mode, requirement R4 does not apply.</p>	<p>Alberta Variance:</p> <p>Did not adopt the revision made by NERC in the last bulleted point in R4 as an outage of an individual synchronous generating unit may have an impact on the reactive power capability of an AGF.</p>
<p>M4 The Generator Operator shall have evidence it notified its associated Transmission Operator within 30 minutes of becoming aware of a change in reactive capability in accordance with Requirement R4. If the capability has been restored within the first 30 minutes, no notification is necessary.</p>	<p>MR4 Evidence of notifying the ISO within thirty (30) minutes of becoming aware of a change in capability as required in requirement R4 exists. If the capability has been restored within the first thirty (30) minutes of the operator of a generating unit or operator of an aggregated generating facility becoming aware of such change, no evidence of notification is necessary. Evidence may include, but is not limited to, voice recordings or operator logs.</p>	<p>MR4 Evidence of notifying the ISO within (30) minutes of becoming aware of a change in reactive power capability as required in requirement R4 exists. If the capability has been restored within the first thirty (30) minutes of the operator of a generating unit or operator of an aggregated generating facility becoming aware of such change, no evidence of notification is necessary. Evidence may include, but is not limited to, voice recordings, <u>or operator logs, or other equivalent evidence.</u></p>	

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<p>R5 The Generator Owner shall provide the following to its associated Transmission Operator and Transmission Planner within 30 calendar days of a request. [Violation Risk Factor: Lower] [Time Horizon: Real-time Operations]</p> <p>5.1. For generator step-up and auxiliary transformers⁵ with primary voltages equal to or greater than the generator terminal voltage:</p> <p>5.1.1. Tap settings.</p> <p>5.1.2. Available fixed tap ranges.</p> <p>5.1.3. Impedance data.</p>	<p>R5 Each legal owner of a generating unit and each legal owner of an aggregated generating facility whose step-up transformer for connecting to the transmission system or auxiliary transformer has primary voltages equal to or greater than the generating unit terminal voltage must provide any one (1) or more of the following to the ISO within thirty (30) days of a request:</p> <p style="padding-left: 40px;">a) tap settings;</p> <p style="padding-left: 40px;">b) available fixed tap ranges; and</p> <p style="padding-left: 40px;">c) impedance data.</p>	<p>R5 Each legal owner of a generating unit and each legal owner of an aggregated generating facility whose step-up transformer for connecting to the transmission system or auxiliary transformer has primary voltages equal to or greater than the generating unit terminal voltage must provide any one (1) or more of the following to the ISO within (30) days of a request:</p> <p style="padding-left: 40px;">a) tap settings;</p> <p style="padding-left: 40px;">b) available fixed tap ranges; and</p> <p style="padding-left: 40px;">c) impedance data.</p>	
<p>M5 The Generator Owner shall have evidence it provided its associated Transmission Operator and Transmission Planner with information on its step-up transformers and auxiliary transformers as required in Requirement R5, Part 5.1.1 through Part 5.1.3 within 30 calendar days.</p>	<p>MR5 Evidence of providing the ISO with information on its step-up transformer or auxiliary transformer, as required in requirement R5 exists. Evidence may include, but is not limited to, dated written or electronic records.</p>	<p>MR5 Evidence of providing the ISO with information on its step-up transformer or and auxiliary transformers, as required in requirement R5 exists. Evidence may include, but is not limited to, dated written or electronic records, <u>or other equivalent evidence</u>.</p>	

⁵ For dispersed power producing resources identified through Inclusion I4 of the Bulk Electric System definition, this requirement applies only to those transformers that have at least one winding at a voltage of 100 kV or above

<u>Comparison Rationale Matrix</u> 2021-02-09 AESO AUTHORITATIVE DOCUMENT PROCESS Alberta Reliability Standard –VAR-002-AB-4.1 — Generator Operation for Maintaining Network Voltages			
NERC VAR-002-4.1	Current Alberta VAR-002-AB-3	New Alberta VAR-002-AB-4.1	Alberta Variances, Reason for Differences and Comments
<p>R6 After consultation with the Transmission Operator regarding necessary step-up transformer tap changes, the Generator Owner shall ensure that transformer tap positions are changed according to the specifications provided by the Transmission Operator, unless such action would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement. <i>[Violation Risk Factor: Lower] [Time Horizon: Real-time Operations]</i></p> <p>6.1. If the Generator Owner cannot comply with the Transmission Operator’s specifications, the Generator Owner shall notify the Transmission Operator and shall provide the technical justification.</p>	<p>R6 Each legal owner of a generating unit and each legal owner of an aggregated generating facility that has a step-up transformer, with off-load taps for connecting to the transmission system must, change the tap positions according to the specifications the ISO provides.</p> <p>R6.1 Each legal owner of a generating unit and each legal owner of an aggregated generating facility that cannot comply with requirement R6 must notify the ISO within thirty (30) days of the ISO providing the specifications, and must include the technical justification along with the notice.</p>	<p>R6 Each legal owner of a generating unit and each legal owner of an aggregated generating facility that has a step-up transformer, with off-load taps for connecting to the transmission system must, change the tap positions according to the specifications the ISO provides.</p> <p>R6.1 Each legal owner of a generating unit and each legal owner of an aggregated generating facility that cannot comply with requirement R6 must notify the ISO within thirty (30) days of the ISO providing the specifications, and must include the technical justification along with the notice.</p>	
<p>M6 The Generator Owner shall have evidence that its step-up transformer taps were modified per the Transmission Operator’s documentation in accordance with Requirement R6. The Generator Owner shall have evidence that it notified its associated Transmission Operator when it could not comply with the Transmission Operator’s step-up transformer tap specifications in accordance with Requirement R6, Part 6.1.</p>	<p>MR6 Evidence of changing step-up transformer taps in accordance with the ISO’s specifications as required in requirement R6 exists. Evidence may include, but is not limited to, written or electronic records.</p> <p>MR6.1 Evidence of notifying the ISO as required in requirement R6.1 exists. Evidence may include, but is not limited to, written or electronic notifications.</p>	<p>MR6 Evidence of changing step-up transformer taps in accordance with the ISO’s specifications as required in requirement R6 exists. Evidence may include, but is not limited to, written or electronic records, <u>or other equivalent evidence</u>.</p> <p>MR6.1 Evidence of notifying the ISO as required in requirement R6.1 exists. Evidence may include, but is not limited to, written or electronic notifications, <u>or other equivalent evidence</u>.</p>	