

The Midwest Reliability Organization’s NERC Standards Review Subcommittee (MRO NSRS) respectfully submits the comments on CAN-0022:

1. AVRs should be in operation while the generator is connected to the interconnected transmission system, providing the generator has AVRs installed. The GOP can only be held responsible when the generator is “connected to the interconnected transmission system”.

VAR-002-1.1b, R1 and VAR-001-1, R4 implies that the generator is “connected to the interconnected transmission system”. This would mean that the breaker is closed. Before or after a breaker is closed or open, the generator does not need to be regulating voltage.

Within this CAN under Providing Evidence of Compliance, please replace “registered entity” with the actual entity that the CAN applies to.

2. The second paragraph quoted above would seem to be in conflict with the first paragraph quoted in that it would require a specific notice for each instance during an operating sequence. To reconcile this potential conflict it is recommended that the second paragraph be modified in a manner similar to the following:

As stated in VAR-002-1.1b R3, a registered entity must notify the Transmission Operator every time (except for the advanced notice previously described) it makes a change — i.e. the Generator Operator must notify the Transmission Operator when the generator is taken out of automatic voltage control mode AND the Generator Operator must notify the Transmission Operator when the generator is returned to automatic voltage control mode.