

CAN Comment Form

Compliance Application Notice – 0022

Please complete the CAN Comment Form and email it to cancomments@nerc.net.

Commenter Information

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Entity Represented: MRO NSRF represented by: Madison Gas and Electric Company, Alliant Energy, Western Area Power Administration, Great River Energy, Xcel Energy, Rochester Public Utilities, Basin Electric Power Cooperative, Lincoln Electric System, American transmission Company, Wisconsin Public Service, Omaha Public Power District, Minnkota Power Cooperative, Midwest ISO, Otter Tail Power Company, Muscatine Power and Water, Nebraska Public Power District

Region: MRO

Primary Interest Groups

Are you suggesting a change to the groups mentioned? **No**

If yes, explain what change and why:

Issue

Are you suggesting a change to the issue statement of the CAN? **Yes**

If yes, explain what change and why: The Issue Statement is incorrect and misleading. Generators are operated in manual during start-up until synced on-line. The Issue Statement should state something to the effect that Generator **Automatic Voltage Regulators** (AVR's) are operated in manual mode during start-up. A Generator and a Generator AVR are two different pieces of equipment.

After the Issue Statement, the term "start-up" is not used. Is this CAN concerned with AVRs during start-up or AVRs not operating in auto, voltage control mode?

Background

Are you suggesting a change to the background statement of the CAN? **Yes / No**

If yes, explain what change and why: Not applicable – there is no Background Statement for this Draft CAN-0022. The Background Statement of the current CAN-0022 states, “The standard requires that each generator connected to the interconnected transmission system be operated in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage).”

Compliance Application

Are you suggesting a change to the compliance application section of the CAN? **Yes**

If yes, explain what change and why: As stated in the Requirement, Generator AVR’s should be in service and controlling voltage *while the generator is connected to the interconnected transmission system*, if the generator has AVR installed (emphasis added). Therefore, the GOP can only be held responsible for compliance to this Requirement when the generator is “connected to the interconnected transmission system.” The phrase “during start-up,” in the Issue Statement implies that the generator is not online, not connected to the interconnected transmission system. To say that the GOP must comply with this requirement before the generator breaker is closed and connected to the interconnected transmission system goes beyond the scope of the Requirement. One way to think about this is the Generator is not really a Generator **until** the breaker is closed and is connected to the interconnected transmission system.

The NSRF wants to point out this CAN would be an appropriate opportunity to provide guidance to the CEA’s concerning Generator AVR’s during start-up. A GOP should not need to turn on the AVR in auto, controlling voltage until AFTER the Generator is online. In addition, the GOP should not need to notify the TOP the AVR is off during start-up. One example to consider would be after a maintenance outage when the Generator may be rolled up to speed more than a few times for testing without actually syncing online.

In paragraph three, NSRF would prefer the following:

CEAs are to verify whether a registered entity opted to provide a blanket notification to its TOP regarding when it would be operating in a mode other than automatic voltage control mode. For instance, a blanket notification could refer to the appropriate times during: 1) Generator testing, 2) Generator start-up, and 3) Generator shutdown. **If the registered entity acted on this option, the CEA is to verify that the registered entity’s TOP received the blanket notification in lieu of separate notifications for each change in status.**

In paragraph four, it states that the Registered Entity notified its TOP “as soon as was **possible**” but within 30 minutes of the change. Requirement 3 of the Standard states “as soon as **practical**, but within 30 minutes of the change.” NSRF suggests some consistency with the language and terms used within the Standard as a basis for writing CANs.

MRO-NSRF’s position would be that an update to the TOP must be made within 30 minutes if one of the following conditions existed:

1. The AVR failed to activate in automatic control mode within 30 minutes of generator breaker synchronization.
2. The AVR failed to manual mode during normal operation (Generator Break Closed and Operating)

If an AVR is being operated in manual to sync to the grid the unit technically isn't connect to the interconnected transmission system until the breaker closes. If the unit failed to go into automatic mode after synchronization, Rule 1 would apply.

If the unit would trip from the grid (Generator Breaker Trip Open) the unit technically would no longer be connected to the interconnect transmission system and none of the above rules would apply. Therefore, no notification on the AVR would be required, however notification to the TOP would still be required for the unit outage and capacity loss of generation.

Effective Period for CAN

Are you suggesting a change to the effective period of the CAN? **Yes**

If yes, explain what change and why: It is disingenuous to have the Effective Period of this Compliance Application Notice with a start date that is before the date it is posted on the NERC website. Is the purpose of this CAN to create a "compliance trap" for the Registered Entities?

Evidence of Compliance

Are you suggesting a change to the evidence of compliance mentioned in the CAN? **No**

If yes, explain what change and why: