

## **Comments of Southern California Edison Company on the Grid Planning Standards Stakeholders Meeting**

SCE appreciates the opportunity to comment on the Grid Planning Standards Stakeholders meeting discussion. Below are specific comments to the material presented on the subject matter during the May 6<sup>th</sup> meeting.

The CAISO is requested to include reactive power planning criteria to the document titled *California ISO Grid Planning Standards* (Draft Revision 1, dated May 6, 2008, “Planning Standards”). Non-thermal system limitations have become a growing concern for the CAISO grid, resulting in the need to conduct frequent reactive power planning and voltage stability studies to ensure system reliability. Additional write-up should be included in the document to outline clearly the acceptable voltage limits and both steady-state and dynamic reactive power planning criteria. There are specific WECC voltage guidelines and reactive reserve margin requirements for Category B & C contingency conditions to ensure reliability. SCE requests that the CAISO confirm whether these reactive margin requirements are still applicable to California PTOs for planning purposes. Similarly dynamic voltage criteria requirements will need to be clearly stated in the Planning Standards, including what magnitude of dynamic voltage dip and what duration of such dip will be allowed in the CAISO-controlled grid. Voltage stability study criteria should be clearly specified in the Planning Standards. The CAISO should also specify load-modeling requirements for voltage stability simulations, including induction motor load modeling and overall composition assumptions. All post-transient voltage criteria will need to be specified to ensure that PTOs can clearly determine voltage violations and identify suitable system reinforcements.