

Stakeholder Comments Template

Subject: Draft California ISO 2010 Transmission Plan posted February 9, 2010

Submitted By	Company or Entity	Date Submitted
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Southern California Edison Company (“SCE”) appreciates the opportunity to provide the California Independent System Operator (“CAISO”) with comments on the Draft 2010 CAISO Transmission Plan (“Draft Plan”). The Draft Plan was the subject of a stakeholder meeting on February 16, 2010. SCE’s comments are specifically focused on Chapter 4, Section 4.4 of the Draft Plan which describes four upgrades to address identified reliability concerns for the SCE service area.

1) Antelope 66 kV System Upgrades

The Draft Plan correctly notes that operating procedures will be used as an interim solution until the reconfiguration project is in service. SCE has an existing operating procedure (OP-68) to mitigate the reliability violations until the East Kern Wind Resource Area 66 kV Reconfiguration Project (“EKWRA”) is in service, which is expected in December 2013. SCE will continue to evaluate the effectiveness of OP-68 as part of our annual reliability transmission assessment until EKWRA is in service.

The Antelope-Bailey 66 kV System is a renewable rich area for both wind and solar development and the interaction of this project with the generation interconnection queue as well as existing generators was raised at the February 16, 2010 stakeholder meeting. Issues such as when particular elements of EKWRA will become available for the interconnection of new generation or which existing generators will require modification to the Wholesale Distribution Access Tariff (WDAT).

The sequencing of specific elements of EKWRA is pending project approval by the CAISO. Project approval will initiate the detailed work of engineering, permitting and determining a construction sequence, all of which could span many months. However, the total scope of work is currently known and will be useful information for stakeholders to determine potential locations for generation interconnection as well as whether an existing generator will require modification to WDAT. SCE would welcome an opportunity to discuss the current EKWRA scope of work with interested stakeholders.

2) Victor 230/115 kV Transformer Bank

In the Draft Plan, the CAISO recommends installing a new Victor 230/115 kV transformer before summer 2019 to provide additional transformer capacity to mitigate identified normal overloading concerns. SCE would like to clarify that the Victor Substation project was approved by the CAISO in a prior Transmission Plan for Category B violations. This project included a 3rd & 4th 230/115 kV transformer bank and a rebuild of the switchrack. The 4th 230/115 kV transformer bank was intended as a spare due to the age of the existing No. 1 and 2 banks. The current schedule anticipates completion of the Victor Substation work, including energization of the 4th 230/115 kV transformer bank in 2012, well in advance of the 2019 Category A overload need.

3) Bailey 230/66 kV No. 2 Transformer Bank

In the Draft Plan, the CAISO recommends energizing the No. 2 spare transformer bank at Bailey Substation to mitigate the voltage deviation under Category B condition beyond Summer 2014. The Draft Plan incorrectly references three transformer banks at Bailey. SCE would like to clarify that there are only two 230/66 kV transformer banks at Bailey and that these are labeled No. 2a and 3a. The No. 3a bank is currently in service and the No. 2a bank is energized on the 230kV side and will be closed on the 66 kV side once the short circuit duty issue is resolved.

4) North of Lugo SPS Enhancement

In the Draft Plan, the CAISO recommends that SCE evaluate modifications to the existing High Desert Power Plant SPS and Kramer SPS to mitigate the post-transient stability problems under Category C conditions. SCE would like to clarify that we will evaluate the transient stability issue and the effectiveness of the existing Special Protection System (SPS) in our annual reliability transmission assessment. Any necessary modifications to the SPS will be provided to the ISO as part of the 2011 ISO Transmission Planning Process.