

2010/2011 ISO Draft Study Plan Stakeholder Comments

No.	Topic Area	Submitter (Name and Company)	Comment Submitted	ISO Response
1	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><u>Stakeholder Participation</u></p> <p>In Section 1.2 of the study plan, the ISO states that it posts the Stakeholder comments on the ISO Website and typically provides responses either in the final transmission plan document or within 4 weeks after the comment period. BAMx would like to point out that in the 2010 planning cycle; the ISO did not provide any responses to comments on the draft study plan. Likewise, the ISO has not, so far, responded to the stakeholder comments filed on November 25, 2009 on posting of the ISO study results and on the presentations by the PTOs comprising their proposed solution. This lack of response of the ISO to stakeholder comments is not conducive to meaningful exchange of ideas between the ISO and the stakeholders, particularly when the stakeholders have no opportunity to provide any further input. Having a response after the projects are approved is not very helpful.</p>	<p>ISO understands and agrees with this comment. All comments from last year has been responded to in the final transmission plan document but recognizes the need to respond after each comment period. We appreciate your input.</p>
2	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><u>Development of Base Power Flow Cases</u></p> <p>In Section 2.1.7 of the study plan, the ISO proposes that a 33% RPS scenario for renewable resources modeled in the planning base cases in this planning cycle. BAMx suggests that the ISO should prepare the base power flow cases consistent with past practices. These traditional base cases should include only those renewables that meet the standard applied in the past to the representation of new generation in the base cases. We understand from the ISO’s comments made in the February 12th Stakeholder meeting that this will be the case for the SCE and SDG&E service areas. We believe that the ISO should adopt the same approach for the PG&E service area. The ISO should create additional scenarios comprising alternative methods of reaching the 33% renewables goal. The assumptions for these cases should be vetted with Stakeholders during the time that these “standard” new generation base cases are developed. During this stakeholder process the latest RETI recommendations with respect to an</p>	<p>The ISO believes that since most of the renewable resources are located in the Southern California, there is no need to have two separated base cases for the Northern Area study. Regarding the reference cases, the ISO believes the study results from the previous transmission plan can be used as the reference if needed.</p>

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			<p>appropriate range of “net short” calculations can be considered along with other assumptions, which will drive the assumed location and characteristics of the renewables.</p> <p>BAMx agrees that some scenarios should be based upon the renewable generation and associated transmission in the ISO queue that is in the multiple stages of interconnection process, and agrees that some 33% RPS scenarios should be run as proposed.</p>	
3	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><i>Sequence of the Study Plan to Develop the Power Flow Cases</i></p> <p>BAMx recognizes that to accomplish the above vetting of assumptions by stakeholders the CAISO will need to publish the final study plan comprising the traditional base cases and only discuss the envisioned stakeholder process that deals with the 33% RPS scenarios.</p>	The ISO will perform studies for both “traditional” reliability cases as well as the renewable-focus reliability cases (for 2015 and 2020 study year scenarios).
4	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><i>Data Availability</i></p> <p>Table 2-9 of the Study plan includes a list of key protection systems modeled in the reliability study. BAMx appreciates the ISO’s efforts in providing this data, which provides considerable insights to stakeholders. However, more detail is probably needed to allow Stakeholders to replicate the CAISO and PTO studies.</p>	Complete detailed information of protection systems seems to be classified as confidential information. However, some details of key SPS or protection schemes have been provided in the contingency files. Complete details of these protection scheme are not currently available to the stakeholders.
5	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February</i>	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission	<p><i>Proposed Power Flow Contingency Analysis</i></p> <p>The ISO claims that it will perform power flow contingency analyses based on the ISO planning standards which are based on the reliability standards established by NERC and WECC, as well as “local reliability criteria.” The “local reliability criteria” are</p>	The “local reliability criteria” is included in the CAISO Tariff section 40.3.1.2 as well as all LCR reports and LCR manuals.

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	12, 2010)	group (BAMx)	<p>neither listed under the CAISO planning standards nor under the CAISO tariff. They are merely defined in the tariff. BAMx requests the ISO to list them in an appendix to the final study plan, if not within the final study plan itself.</p> <p>The ISO claims that the study would simulate all single contingencies in the area (include considering all combination of <i>N-1</i> and <i>G-1</i> contingencies), all double circuit tower line outages plus all combinations of any two elements (generator, line, transformer) out as well as <i>combinations of any one element out followed by double circuit tower line outages</i>. Please explain further the reasons for these studies. The latter type of contingency (<i>N-2-1</i>) appears to be a new requirement. Would this be a level D criterion?</p> <p>The ISO has provided Delta Energy Center and Otay Mesa power plant as examples of the Combined Cycle plants- the outages of their entire capacity are studied as <i>G-1</i> contingencies. Please list all the combined cycle generation whose whole plant should be considered a single <i>G-1</i> contingency.</p>	<p>N-1 followed by system readjustment and common mode L-2 has a requirement of no voltage collapse or dynamic instability under the "local reliability criteria".</p> <p>There is no need for a list they are all treated the same.</p>
6	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><i>Post Transient Analyses</i></p> <p>The ISO indicates that for the SCE system, the voltage deviation of 7% for "N-1" contingencies is observed and 10% for "N-2" contingencies. Please explain why SCE's voltage deviation threshold of 7% is higher than the WECC criterion of 5% for "N-1" contingency and why this complies with WECC standards.</p>	<p>For the studies in SCE system, a G-1 of SONGS and an N-1 of other critical transmission lines are studied as Category B contingency. Since the G-1 of SONGS is a major element outage, coupled with other single line outages that go beyond the current WECC definition of Category B outages, a 7% voltage deviation is monitored instead of a 5% for single element outage required by WECC. In addition, WECC standards apply to other affected systems, while SCE takes on the 7% as requirements for its own system.</p>

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7	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><u>Power Factor Assumption</u></p> <p>The ISO has included the power factors for SCE & SDGE as part of the reliability assessment study assumptions, however not for the PG&E area. Please explain the power factor assumptions for PG&E.</p>	<p>Power factor is calculated by PG&E from actual data produced for the season of study. Every year PG&E reads the bank by bank loading charts and this data is used in the next year load distribution factor as well as power factor accuracy.</p>
8	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><u>Economic Planning Study Results</u></p> <p>The 2011 study plan directs the reader to section 2.3 of the 2010 final study plan. Upon reviewing this section, BAMx has the following questions/comments.</p> <ol style="list-style-type: none"> 1. Phase 1: It is our impression that in the 2010 planning cycle, the ISO has conducted most of the analyses conceptualized in Phase 1, which includes <ol style="list-style-type: none"> a. Congestion Evaluation using production cost simulation to simulate 8,760 hours of system operation for each study year. b. Tabulate Grid congestion and rank by congestion costs (million dollars) and congestion duration (hours). c. The first five congestion issues are identified as high-priority studies. However, there was another step in Phase 1, where the ISO was supposed to associate those high-priority studies with stakeholder-proposed mitigation plans in their study requests. BAMx does not think that this task was performed. Is that accurate? Please indicate if it was performed or if the ISO plans to perform this step during the 2011 planning cycle. 2. Phase 2: The Phase 2 of the Economic Planning study, i.e., Congestion Mitigation involved the following two analyses: <ol style="list-style-type: none"> a. <i>Comparative Analysis:</i> For the five high-priority studies, the ISO would run production cost simulation to compute economic benefits of the mitigation plans. Then, cost-benefit analysis would compare the net Benefit of the mitigation plan and select the most economic alternative; 	<p>The ISO will conduct additional congestion studies during the 2011 planning cycle using the TEAM methodology described in the 2010 Study Plan and will provide stakeholders with information when a timetable has been developed. As described in the 2010 Transmission Plan, the congestion study results posted during the 2010 planning cycle were preliminary and were not used to identify congestion mitigation solutions.</p>

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			<p>and</p> <p>b. <i>Uncertainty Analysis</i>: With the most economic alternative identified, if the net benefit (benefit minus cost) is positive, the mitigation plan would be studied in uncertainty analysis, also known as sensitivity analysis. In the uncertainty analysis, some major study assumptions (e.g. load forecast, hydro condition and natural gas prices) are varied to test the robustness of the mitigation plan.</p> <p>It is our understanding that none of the above two analyses were conducted during the 2010 planning cycle. Are we correct? If so, does the ISO envision conducting either of these analyses, comparative or/and uncertainty, during the 2011 planning cycle? If so, what is the expected timeline? Does the ISO plan to provide the results for Phase 1 and Phase 2 studies simultaneously or sequentially?</p>	
9	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Barry Flynn & Pushkar Waglé, Bay Area Municipal Transmission group (BAMx)	<p><u>Once Through Cooling Study</u></p> <p>The ISO’s section titled, “Once Through Cooling” (OTC) is purely a description of the issue and not a study plan. BAMx encourages the CAISO to plan a stakeholder process to develop a detailed OTC study plan. This should be accomplished after publication of the study plan for 2011. The study plan should describe the Stakeholder process to develop the OTC study scenarios.</p> <p>In this context BAMx would like to reiterate our prior comments to the ISO on the 2020 Renewable Transmission Conceptual Plan. Care needs to be taken to differentiate between RPS stand-alone upgrades versus those driven by the OTC retirement.</p>	The ISO plans to have three-phase approach in performing reliability assessment of OTC units based on the State Water Resources Control Board’s approved policy, when it’s made available to the public. The stakeholders can see substantial addition to the Study Plan on pages 23 – 25 posted on the ISO website (http://www.caiso.com/276a/276af0692d6e0.pdf).
10	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-7: Reliability -- NERC/WECC criteria: Note that the CAISO's 2011 study plan doesn't mention new areas of focus such as NUC-001.	The final Study Plan has included NUC-001 in the scope of the study

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11	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-9: Generation – Define the use of peakers with regards to dispatch and mitigation.	For reliability purposes, all available generation can be used to mitigate transmission constraints. If the initially assumed generation dispatch in the base cases results in identified overloads or voltage problems, and generation capacity, including peakers, is available to be dispatched to mitigate the problem, then generation dispatch will certainly be considered as a mitigation measure.																																				
12	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010))</i>	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	<p>PG-10: Contingencies – Clarify additional contingencies such as SPWL out and how they are categorized</p> <p>PG-10: Study Base Cases – The following WECC base case have been identified and used by SDG&E. Unless SDG&E is notified of issues/concerns ASAP, all cases will be developed utilizing the following:</p> <table border="1" data-bbox="792 899 1247 1360"> <thead> <tr> <th>Year</th> <th>WECC name</th> <th>Posting Date</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>2010HS3-Op</td> <td>02/2010</td> </tr> <tr> <td></td> <td>2010LS1-Op</td> <td>03/2010</td> </tr> <tr> <td>2012</td> <td>2013HS1-S</td> <td>10/2008</td> </tr> <tr> <td></td> <td>2013LW1-S</td> <td>01/2009</td> </tr> <tr> <td>2013</td> <td>2013HS1-S</td> <td>10/2008</td> </tr> <tr> <td></td> <td>2013LW1-S</td> <td>01/2009</td> </tr> <tr> <td>2014</td> <td>2014HS3-S</td> <td>03/2010</td> </tr> <tr> <td></td> <td>2014HW1-S</td> <td>01/2009</td> </tr> <tr> <td>2015</td> <td>2014HS3-S</td> <td>03/2010</td> </tr> <tr> <td></td> <td>2014HW1-S</td> <td>01/2009</td> </tr> <tr> <td>2020</td> <td>2018HS1-S</td> <td>06/2008</td> </tr> </tbody> </table>	Year	WECC name	Posting Date	2011	2010HS3-Op	02/2010		2010LS1-Op	03/2010	2012	2013HS1-S	10/2008		2013LW1-S	01/2009	2013	2013HS1-S	10/2008		2013LW1-S	01/2009	2014	2014HS3-S	03/2010		2014HW1-S	01/2009	2015	2014HS3-S	03/2010		2014HW1-S	01/2009	2020	2018HS1-S	06/2008	The final Study Plan has reflected these comments
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			2019HW1-S	08/2009	
13	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-11:	<ul style="list-style-type: none"> • Generation Projects – Please provide a detailed list all generation projects and associated network upgrades to be modeled for general study years as well as the specific renewable sensitivity studies that have been identified for 2015 and 2020. • Verify use of CEC 2009 forecast. • Include an explicit explanation of how demand-side management program effects could be considered in the net load forecasts. If not, make clear why this assumption was made. If DSM programs are studied as a potential mitigation, please include the criteria by which programs may be included in such analysis. 	<p>The ISO will provide non-confidential information regarding generation assumptions along with the 2015 and 2020 cases.</p> <p>The CEC 2009 is the primary source of load forecast used in this planning cycle.</p> <p>Regarding DSM, the ISO will model proven DSM amount as load modifier in some specific local reliability studies. If such proven DSM is to be used as a mitigation alternative, the ISO will need specific proven DSM program as part of the alternative to transmission upgrade in the PTO's submittal of the project into the ISO Request Window.</p>
14	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-12:	<ul style="list-style-type: none"> • Table 2-4 – Re-title Central as Suncrest substation. • List ISO approved 69kV capacitors from 2010 Trans Plan 	The final Study Plan has reflected these comments
15	<i>Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)</i>	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-17: Study Methodology – Category B's?	<ul style="list-style-type: none"> • Clarify statement about “all double circuit tower line outages plus all combinations of any two elements” • Clarify statement about “combinations of any one element out followed by double circuit tower line outages”, N-1-2? 	The final Study Plan has reflected these comments

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16	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	<p>PG-19:</p> <ul style="list-style-type: none"> Power Factor – List PF as 0.992, not 0.995 as shown. The PF was listed incorrectly in last years study plan as well, although the 2010 Transmission Plan had the correction. There have been several discussions about different methodologies regarding PF. Unless otherwise stated/required in the study plan by the ISO, SDG&E will utilize 0.992 again, at nearly all load busses, with the exceptions currently listed in the draft study plan. LCR - The load forecast should be adjusted to include the effects of DSM programs, since these programs may count towards LCR requirements. 	<p>Based on validation works on the power factor, the 2011 and 2012 cases will model substation specific power factor and the 2013 and beyond cases will model 0.992 power factor. The ISO recommends that another validation on the load bus power factor be performed after the peak for 2010 time frame.</p> <p>There is no need to adjust the load forecast for DSM. Planning activities need to serve all loads in the system including DSM. True DSM can be used for “certain” specific overall outages and if such it will be considered as an alternative to the proposed upgrades.</p>
17	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-20: Economics Study – Will any project proposals from last years request window be modeled in any of this years cases/sensitivities?	The request window submissions from 2008 and 2009 will be reviewed as part of the ISO’s holistic evaluation of the need for transmission upgrades or additions during the 2010/2011 planning cycle.
18	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Maurizio De Julio, San Diego Gas & Electric (SDG&E)	PG-21: Once Through Cooling – Clarify responsibilities of the studies and provide detailed information for possible retirement schedules.	The ISO will primarily perform these studies and may check with the PTOs for any needed assistance during this process.
19	Stakeholder Meeting #1 – 2010/2011	Ann Finley, Metropolitan Water District	<p><u>Draft Study Plan for 2011 ISO Transmission Plan</u></p> <p>MWD requests ISO add SCE’s Eagle Mtn 230 and J. HindsSCE 230 kV buses to</p>	<p>1. MWD requests are incorporated into the Final Study Plan on page 20.</p>

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	<p>Study Plan (February 12, 2010)</p>	<p>(MWD)</p>	<p>the voltage stability and reactive power margin analyses listed on p. 18.</p> <p>MWD requests ISO correct the representation of the Blythe SPS on page 16 and in the contingency files on ISO's secure transmission planning website. The description on page 16 is incorrect for the 2011 timeframe and several of the contingency files are tripping three Blythe I units instead of one CT, which will mask potential overloads that may occur on SCE or MWD's transmission systems if not properly analyzed. Please contact David Franklin at SCE to obtain the proper representation of the Blythe SPS and contingency responses. Below is a listing of some of the contingency files that will need to be corrected: https://www.caiso.com/TPStudy/NonMktr/241f/241fc4952b870.con</p> <p>CONTINGENCY 19) line_2081 "DEVERS 230.00 - MIRAGE 230.00 1, J.HINDS 230.00 - MIRAGE 230.00 1" /* File SCEEasternBulk_v5.otg Line # 78</p> <p>CONTINGENCY 24) line_2209 "Devers-Mirage 230 kV line & J.HINDS - Mirage 230 kV line " /* File SCEEasternBulk_v5.otg Line # 98</p> <p>CONTINGENCY 26) line_2211 "Ramon-Mirage 230 kV line & Julian Hinds-Mirage 230 kV line (summer)" /* File SCEEasternBulk_v5.otg Line # 106 This outage actually commented out the tripping of the Blythe Units.....please verify</p> <p>CONTINGENCY 75) line_0025 "line J.HINDS to MIRAGE 230 ck 1" /* File SCEEasternBulk_v5.otg Line # 260 END</p> <p>CONTINGENCY 76) line_0026 "line J.HINDS to EAGLEMTN 230 ck 1" /* File SCEEasternBulk_v5.otg Line # 263</p>	<p>2. Addressed this request on page 17 of the Final Study Plan. The ISO will incorporate correct representation of MWD SPS for the mentioned SPS.</p>
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20	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Keith White, California Public Utilities Commission	Renewable generation scenarios should assume delivery, to the aggregate of load, of target amounts of renewable generation from identified resource areas.	The ISO will provide more descriptions of assumptions used in these cases in the 2011 Study Plan.
21	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Keith White, California Public Utilities Commission	Within the extent of study resources and timelines, such scenarios should reasonably include or reflect (e.g., bound) scenarios/portfolios being provided by the CPUC such as those emerging from ongoing RETI- and LTPP-related efforts. Where feasible, this should apply to resource scenarios used in once-through cooling plant studies.	The ISO is working collaboratively with the State energy agencies (CPUC and the CEC) as well as the State Resources Control Board to include resource and demand scenarios that were provided into the load & resource scenario analyses related to once-through cooling plant studies.
22	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Keith White, California Public Utilities Commission	Actual “renewable” transmission expansion planning will be via the RETPP. Transmission required for delivery of renewable generation to the aggregate of load is expected to be more comprehensively planned in the new RETPP. While 2010 reliability studies for the 5- and 10-year time horizons may make convenient assumptions about such “renewable” transmission, we would expect that transmission recommendations or “results” coming out of the reliability studies will focus on more localized reliability needs, especially those that are urgent and/or not confined to particular (potential) resource scenarios.	The ISO generally concurs with this comment
23	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Keith White, California Public Utilities Commission	For the reliability studies, re-dispatch and curtailment assumptions regarding both renewable and non-renewable generation should be explicit and transparent, and should reflect priority delivery of renewable energy in an economic manner consistent with reliability standards. In this respect, we support the intent stated at the February 12 stakeholder meeting to consider bounding or “bookend” sensitivities regarding the delivery of assumed renewable generation, ranging from full deliverability via “firm” transmission (e.g., providing maximum resource adequacy credit for the renewable	The ISO generally concurs with this comment. However, the number of sensitivities regarding delivery of renewable generation may be limited by the study schedule.

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			generation), versus a lower level of deliverability perhaps requiring less transmission expansion but also occasional curtailment or re-dispatch. However, to reiterate, we understand that the main objective of such studies will be to clarify the implications for <i>reliability problems and needs</i> at the “downstream” (load) end of the network, not design of the actual transmission expansions accessing and delivering renewable generation, which will be the focus of the proposed new RETPP.	
24	Stakeholder Meeting #1 – 2010/2011 Study Plan (February 12, 2010)	Keith White, California Public Utilities Commission	<p>For special studies on once-through cooling (OTC), as noted in discussion at the February 12, 2010 stakeholder meeting, the OTC study needs to be conducted on an annual basis from 2011 through 2020 in order to properly advise SWRCB as to the specific year in which an individual OTC power plant can be shut down for retrofit or retired. Unlike many other regulations, the proposed OTC policy of the SWRCB staff does not have fixed compliance dates. Rather, the nominal dates in the proposed policy are subject to change based on the advice of the CEC, CPUC and CAISO. Thus, the study needs to examine a range of scenarios for each year so as to properly advise SWRCB about the timing constraints regarding temporary or permanent shutdown schedules. As noted in the stakeholder discussion, this differs from the majority of the 2011 TPP Study Plan in which years 1 - 5 and 10 will be examined. For OTC scheduling purposes, years 6-9 are more likely to be of interest than years 2-4.</p> <p>Second, discussion and preparation of the OTC study plan could be strengthened by noting that the intended OTC study differs from the conventional practices followed in constructing power flow cases by explicitly evaluating the relative impacts of speculative generation development versus speculative transmission development as well as because of significant load forecast variations from Base Case assumptions. At least in the initial study conducted in 2010, these wider variations from standard practices are offset by the fact that no projects are likely to be approved as a result of the analyses. Rather, the analyses in the 2010 initial study are more exploratory, seeking to better understand the complexities of generation versus transmission development in an environment in which load modification through demand-side policy initiatives may also be pursued, and in which renewable generation integration issues will also come into play. Specific transmission solutions to reduce reliance on</p>	The ISO outlines the phasing of the studies in the latest Study Plan. The ISO also plans to re-visit the reliability assessment of the affected OTC plant(s) based on the latest implementation plan from the generation owner on the annual studies as required.

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			OTC power plants would likely be identified once more detailed analyses are completed in subsequent planning cycles.	
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