

Stakeholder Comments Template

Reactive Power Requirements and Financial Compensation

Addendum to Draft Final Proposal

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the addendum to the draft final proposal for the Reactive Power Requirements and Financial Compensation initiative that was posted on July 21, 2016. The addendum to the draft final proposal and other information related to this initiative may be found at:

<http://www.aiso.com/informed/Pages/StakeholderProcesses/ReactivePowerRequirements-FinancialCompensation.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **August, 4 2016**.

1. Please provide your comments on the proposed automatic voltage regulation requirements for asynchronous resources.

Southern California Edison (SCE) appreciates the CAISO's efforts through its stakeholder process for asynchronous resources to provide reactive power and the attendant restoration, in response to FERC Order 827 regarding Reactive Power Requirements for Non-Synchronous Generation, of the CAISO's previously suspended Draft Final Proposal. Although FERC Order 827 requires all newly interconnecting non-synchronous generators to provide reactive power as a condition of interconnection, it does not require all of the same technical requirements for reactive power capability and voltage regulation proposed by the CAISO in its Draft Final Proposal. The following are SCE's comments on the CAISO's Addendum to Draft Final Proposal.

SCE supports the CAISO's Addendum to the Draft Final Proposal to seek from FERC additional automatic voltage control capabilities for newly interconnecting asynchronous

resources required to provide reactive power. As stated in its comments submitted on the Draft Final Proposal, SCE supports the entirety of the CAISO's reactive power requirements proposal, including the establishment of automatic voltage control capabilities as part of the operational requirements for asynchronous resources. Automatic voltage control is needed for resources interconnected to CAISO system to actively move within their required power factor range in order to maintain voltage schedules. Automatic voltage control capabilities are not contained in FERC Order 827. Thus, SCE supports the Addendum.