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**Sent:** Wednesday, January 18, 2012 4:00 PM

**To:** Price, James

**Subject:** Fw: CAISO: Issue Paper and Straw Proposal for Transmission Reliability Margin

Hello,

Our comments are below in green:

In the presentation (Page 5), it reads:

The following components of uncertainty may establish TRM:

- Allowances for parallel path (loop flow) impacts.
- Forecast uncertainty in Transmission system topology (including, but not limited to, forced or unplanned outages and maintenance outages).
- Allowances for simultaneous path interactions.
- Aggregate Load forecast.
- Load distribution uncertainty.
- Variations in generation dispatch (including, but not limited to, forced or unplanned outages, maintenance outages and location of future generation).
- Short-term System Operator response (Operating Reserve actions ).
- Reserve sharing requirements.
- Inertial response and frequency bias.

ISO proposes to implement TRM for the above **three highlighted items**

1. What is ISO's justification to implement TRM only for the above three highlighted items?
2. As Renewable Portfolio Standard (RPS) reaches 33%, the renewable energy will have higher impact on TRM. What is the reason not to consider the impact of the uncertainty caused by the high penetration of renewable energy?

Thanks.

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Transmission Interconnection Planning

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