

Stakeholder Process: Decision on ISO Planning Standards

Summary of Submitted Comments

Stakeholders submitted two rounds of written comments to the ISO on the following dates:

- First round, by 05/09/11
- Second round, by 05/27/11

Stakeholder comments are posted at: <http://www.caiso.com/2b7b/2b7b92025d30.html>

Other stakeholder efforts include:

- Stakeholder meeting held on 05/02/11
- Stakeholder conference call held on 05/20/11
- Individual outreach in order to clarify and address individual stakeholder concerns

Management Proposal	BrightSource Energy Inc.	First Solar Inc.	Pacific Gas & Electric	BAMx ¹	CDWR ²	San Diego Gas & Electric	STFC and UCAN ³	Management Response
Loss of combined cycle power plant module as a single generator outage standard:	Support Please add definition of combined cycle power plant module.	No Comment	No Comment	No Comment	No Comment	Support Proposed additions to this standard for certain critical transformer outages and underground cables.	No Comment	1. BrightSource's comments were addressed in next draft; see section VII in page 14. 2. SDG&E's comments were addressed in the ISO reply to stakeholder comments.
Voltage standard:	No Comment	Support Conditional The upper voltage under normal conditions is too high at 1.1 per unit (pu). Minimum voltage is needed for the 500 kV system due to generator auxiliary loads.	Support Conditional The upper voltage under normal conditions is too high at 1.1 per unit (pu). Allow exceptions to this standard.	Support Conditional Allow exceptions to this standard. Estimate the impact of this new standard. Elaborate on process for exceptions to this standard.	No Comment	No Comment	No Comment	1. All comments received from First Solar and PG&E as well as several from BAMx were addressed in next draft. 2. Some of BAMx comments were addressed in the ISO reply to stakeholder comments.
Planning for new transmission versus involuntary load	Support Conditional General concerns about the	Support Conditional General concerns about the	Support Conditional General concerns about the	Support Conditional Allow exceptions to this	General Support General concerns about the magnitude and cost impact	Support The advantage of fixed load shedding limits is that it gives a clear	No Comment	1. Concerns about the magnitude and cost were addressed by downgrading this standard to a guideline for the first year. If the

¹ BAMx represents Bay Area Municipal Transmission Group

² CDWR represents California Department of Water Resources

³ STFC represents Save the Foothills Coalition and UCAN represents Utility Consumer Advocate Network

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interruption standard:	magnitude and cost impact to ratepayers.	magnitude and cost impact to ratepayers.	magnitude and cost impact to ratepayers. Please define "available back-tie". Apply the 250 MW cap to category C contingencies as well.	standard. General concerns about the magnitude and cost impact to ratepayers.	to ratepayers.	performance target and greatly simplifies the planning process. Proposed changes in magnitude for different category contingencies.		impact is greater than expected, this standard or part of this standard will be changed. 2. Other stakeholder comments were addressed in the ISO reply to stakeholder comments.
New Special Protection System (SPS) guideline:	Support Performance review process for SPS should be done through an open process.	Support Add language and reference to the WECC Remedial Action Scheme Design Guide.	Support Evaluate SPS on case by case bases without a pre-described formula of certain number of local contingencies and system elements.	Support Performance review process for SPS should be done through an open process.	Support Add language related to the frequency of existing involuntary load tripped that may not be increased as a result of a new generation addition to the grid and the SPS. Add language to address the fact that involuntary load tripping will be used as a last resort. Performance review process for SPS should be done through an open process.	Support Expand the definition of an allowable SPS to include the insertion or removal of reactive devices.	No Comment	1. All comments received from First Solar as well as several from CDWR were addressed in next draft. 2. The review process for SPS will be done through the regularly scheduled TPP stakeholder meetings. 3. Other stakeholder comments were addressed in the ISO reply to stakeholder comments.

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Other comments:	<p>Support Conditional</p> <p>Keep NERC and WECC definition of Bulk Electric System. Change “time allowed for manual readjustment” from existing 30 minutes to facility ratings.</p>	No Comment	<p>Support Conditional</p> <p>Keep NERC and WECC definition of Bulk Electric System. Change “time allowed for manual readjustment” from existing 30 minutes to facility ratings.</p>	<p>Undecided</p> <p>Add more time and more rounds of discussions with stakeholders to this process.</p>	<p>Support</p> <p>CDWR generally supports the CAISO’s recent effort to revise its existing planning standards.</p>	<p>Support</p> <p>Add a “critical T-1/G-1” standard as a category B contingency. Add a reactive margin criteria based on fixed MVAR quantity. Add common “duct line” as a credible C5 contingency. Include LCR criteria and deliverability assessment methodology under the ISO Planning Standards. Develop criteria for establishing uniform equipment rating criteria among PTOs. Address modeling issues like distributed generation, demand response or generator Pmin.</p>	<p>Undecided</p> <p>Explain why ISO needs to have any reliability standards beyond NERC and WECC. Explain the need for each individual standard.</p>	<p>1. ISO’s definition of “Bulk Electric System has been eliminated and a new ISO standard created in order to assure that elements not covered by the NERC definitions get planned at the same level.</p> <p>2. Other stakeholder comments were addressed in the ISO reply to stakeholder comments.</p>