

## 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 04/25/14
- Second Round, by 06/11/14
- Third Round, by 08/11/14

Stakeholder comments are posted at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/TransmissionPlanningStandards.aspx>

Other stakeholder efforts include:

- Stakeholder Meeting held on 04/11/14
- Stakeholder Conference call held on 06/04/14
- Stakeholder Conference call held on 07/28/14
- One on one outreach in order to clarify and address individual stakeholder concerns

Management Proposal	Smart Wire Grid, Inc.	Southern California Edison	Pacific Gas & Electric	San Diego Gas & Electric	BAMx <sup>1</sup>	CCSF <sup>2</sup>	Six Cities <sup>3</sup>	CPUC <sup>4</sup>	ORA <sup>5</sup>	Management Response
<p><b>Planning for High Density Urban Load Area Standard:</b></p>	<p>Support Conditional</p> <p>General concerns about the magnitude and cost impact to ratepayers.</p> <p>Requests details and consistency about what is considered high density load area.</p>	<p>Support</p> <p>General concerns about the magnitude and cost impact to ratepayers.</p> <p>Requests details and consistency about what is considered high density load area.</p> <p>Editorial suggestion.</p>	<p>Support</p> <p>Requests details and consistency about what is considered high density load area.</p>	<p>Support</p> <p>Explicit supporting comments.</p>	<p>Support Conditional</p> <p>General concerns about the magnitude and cost impact to ratepayers and wants redesign of existing standards to generally use benefit-cost analysis as a consistent and coherent method.</p> <p>Requested details and consistency about what is considered high density load area.</p>	<p>No Comment</p>	<p>Support Conditional</p> <p>General concerns about the magnitude and cost impact to ratepayers.</p>	<p>Support Conditional</p> <p>General concerns about the magnitude and cost impact to ratepayers.</p> <p>Requests details and consistency about what is considered high density load area.</p> <p>Would like to see exemptions to this standard also being made available.</p>	<p>Opposed</p> <p>General concerns about the magnitude and cost impact to ratepayers, and wants benefit-cost calculations to be the primary method.</p>	<p>1. Details regarding high density load areas and maps have been added to the standard.</p> <p>2. Editorial comments have been included.</p> <p>3. There is no increase to ratepayer cost since this is the status quo (i.e., proposal is simply codifying what has been the ISO's established practice).</p>

<sup>1</sup> BAMx represents Bay Area Municipal Transmission Group

<sup>2</sup> CCSF represents City and County of San Francisco

<sup>3</sup> Six Cities represents the cities of Anaheim, Azusa, Banning, Colton, Pasadena and Riverside

<sup>4</sup> CPUC represents California Public Utilities Commission

<sup>5</sup> ORA represents Office of Ratepayer Advocates

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<b>Extreme Event Reliability Standard:</b>	No Comment	Support  For transparency reasons would appreciate more language regarding when an extreme event would initiate a review of potential mitigations.	Support  Explicit supporting comments	Support  Standard should be general in nature and open to other areas if warranted.	Support  Standard should be general in nature and open to other areas if warranted. However questions the need and value of this new standard.	Support  Explicit supporting comments	Support  Standard should be general in nature and open to other areas if warranted.	Support Conditional  Would like to see a lot more details included in the standard like: credible events and probabilities MW and locations, consequences.	Undecided  Questions the need for the standard and this standard should be general in nature and open to other areas if warranted.	1. Standard has been revised to potentially include other areas of the grid (besides San Francisco) if they can be shown to also have unique characteristics 2. Details CPUC is requesting will be provided in the technical analysis of whether mitigation is warranted – not in the standard.

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<b>Updates required due to new NERC transmission planning standards:</b>	Support  Requested change or clarification regarding discrepancy between ISO footnote 6 and NERC footnote 12.	Support  Implement these changes into the 2015-16 transmission planning cycle.	Support  Requested change or clarification regarding discrepancy between ISO footnote 6 and NERC footnote 12.  Several editorial suggestions and clarifications	Support  No firm load drop should be allowed in long-term planning to address TPL-001-4 category P0-P4.	Support  Explicit supporting comments.	No Comment	No Comment	Support  Would like to know the impacts of the NERC standard changes.	No Comment	1. All editorial and clarification language has been included as requested. 2. Impact of NERC standards changes will be quantified in the 2015-16 TPP.
<b>Other comments:</b>	No Comment	Support  Add preferred resource characteristics to the ISO Grid Planning Standards.	No Comment	No Comment	No Comment	No Comment	No Comment	No Comment	No Comment	1. Mitigation alternatives (e.g., preferred resource characteristics) are not specifically discussed in the ISO planning standards.