

Stakeholder Comments Template

**2014-15 CAISO Draft Transmission Plan and February 17
Stakeholder meeting**

Please submit comments (in MS Word) to regionaltransmission@caiso.com.

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) appreciates the opportunity to provide comments to the CAISO on its 2014-15 Draft Transmission Planning Process (TPP), and February 17, 2015 stakeholder meeting. SCE has reviewed the draft plan and participated in the stakeholder meeting. SCE looks forward to continuing to work with the CAISO in this process. Below please find SCE’s comments on the draft plan.

Demand Response Assumptions

SCE appreciates the CAISO’s assessment and consideration of nontraditional resources to support the CAISO grid. This is a significant development, and builds on the previous work by the CAISO in the 2013-14 TPP.

Table 3.2-7 (page 146) indicates that SCE currently has 181 MW of demand response that can be used by the CAISO to meet a contingency condition¹ (i.e., “fast” product with response time within 20 minutes to allow Operator’s adequate response time).² In fact, SCE currently has approximately 90 MW of such existing “fast” demand response located in the CAISO-identified effective locations³ primarily in the Southwestern LA Basin in the Draft TPP. SCE shares the CAISO’s goal of meeting LCR needs through the most cost effective alternatives and will continue to work with the CAISO to evaluate potential ways to meet this contingency, including consideration of existing and potentially new demand response alternatives.

¹ The specific contingency is “N-1-1: ECO-Miguel 500kV, system readjusted, followed by Ocotillo-Suncrest 500kV Line.”

² TPP at 145 n. 37.

³ CAISO-identified effective locations include Alamos, Barre, Del Amo, Ellis, Johanna, Lewis, Santiago, Viejo, and Villia Park. Available at CAISO’s Draft Plan, Appendix E (page 83) - <http://www.caiso.com/Documents/AppendixEDraft2014-2015TransmissionPlan.pdf>

San Luis Transmission Line

Duke-American Transmission Company, Path 15, LLC (Duke) proposed expanding Western Area Power Administration (Western)'s proposed 230 kV San Luis Transmission Line to 500 kV, adding 1,200 MW of incremental capacity to the transmission operated by the CAISO. The Duke proposal provides for 75% of project costs (\$375M of the estimated \$500M project cost) to be allocated to CAISO customers and 25% of the project costs allocated to Western customers. In its draft 2014-2015 Transmission Plan, the CAISO indicated that it does not currently have a need for this additional capacity and is not able to justify the expansion on economic, public policy, or reliability grounds. Accordingly, CAISO decided not to include Duke's proposal in its 2014-15 Transmission Plan. SCE supports the CAISO's findings as it would be inequitable for the CAISO customers to pay for this project, given the current lack of benefits for CAISO customers. Given that the proposed San Luis project appears to impact two planning regions – CAISO and WestConnect (for Western) - it may be more appropriately considered for interregional cost allocation.