

Stakeholder Comments Template

Subject: Interconnection Standards Whitepaper

Submitted By	Company or Entity	Date Submitted
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Southern California Edison Company (“SCE”) appreciates the opportunity to provide the California Independent System Operator (“CAISO”) with comments on the CAISO Interconnection Standards Review Initiative Draft Straw Proposal (“Straw Proposal”) dated March 25, 2010. The Straw Proposal was the subject of a stakeholder meeting on April 1, 2010.

There are no objections on SCE’s part to the items discussed in the presentation entitled “Interconnection Standards Review Initiative” given at the Stakeholder meeting on April 1, 2010.

On the whole, SCE concurs with the fact that it is important that the CAISO and the Participating Transmission Owners (PTOs) continue to collaborate in a timely manner to ensure that the appropriate requirements and standards are developed for the safe and reliable interconnection of renewable generation. Additionally, it supports CAISO’s plan to have this effort performed in conjunction with the ongoing efforts by the NERC task force in developing the NERC Voltage and Frequency ride through criteria so the standards echo one another.

Nonetheless, given the fact that SCE recently participated in a Low Voltage Ride-Through (LVRT) workshop, SCE would like to make a note of the fact that the current FERC Order No.661a LVRT standard and the new proposed LVRT/HVRT (High Voltage Ride-Through) standard does not specify if the ride-through capability is needed per wind turbine or wind plant. Additionally, the document does not specify how the LVRT curve should be interpreted under multiple fault conditions.

SCE suggests that the new LVRT/HVRT standard try to address these issues for new Variable Energy Resource (VER) plants.