

Stakeholder Comments Template

Subject: Revised Planning Standards

Submitted by	Company	Date Submitted
<i>Chifong Thomas</i> 1+ (510) 250-8166 cthomas@brightsourceenergy.com	<i>BrightSource Energy</i>	5/27/11
<i>Paul Didsayabutra</i> 1+ (510) 250-6984 pdidsayabutra@brightsourceenergy.com		

BrightSource Energy, Inc. (BSE) has the following comments on the CAISO's proposed planning standards posted on May 13, 2011. BSE appreciates the CAISO's effort to clarify and codify the existing CAISO Planning Standards. BSE has some concerns about the CAISO's interpretations of the NERC Standards and WECC Criteria, as well as the CAISO's response to one of the prior comments.

Comments:

1. As detailed herein, BSE is concerned that the CAISO's proposed standard for the "Time Allowed for Manual Readjustment" is not appropriate, and could compromise reliability, require unnecessary transmission, and impact deliverability of projects unnecessarily. On page 14, the CAISO maintains that the "Time Allowed for Manual Readjustment" is "the amount of time required for the operator to take all actions necessary to prepare the system for the next contingency. This time should be less than 30 minutes."

In BSE's comments submitted on 5/9/2011, it reminded the CAISO that the 30 minutes applies to Intertie Facilities, which has established 30-minutes emergency ratings and for which the transmission operators have the means to monitor to correct the power flow on the impacted facilities to below their 30 minute ratings. Applying the same 30-minute time for adjustment to lower voltage facilities, which are typically modeled with 1- to 4-hour emergency ratings, is internally inconsistent. We suggested that the time for manual adjustment after the first contingency be changed to reflect the facility ratings used by the CAISO.

In its response, the CAISO states that “the ISO believes that the system under ISO control should be planned and operated at or above what is required by WECC in relation to other neighboring systems. If system is not readjusted until the facility rating expires, the ISO could assume the risk of NERC noncompliance for category C3.”

BSE disagrees. Allowing the time for manual adjustment after the first contingency to reflect the Facility Ratings provided by the Facility Owners and modeled in the study does not mean waiting until the “rating expires” to adjust the system. It merely allows the Facilities to be utilized as designed such that the loadings on the Facilities will be within the “Applicable Ratings” allowed in NERC Standards TPL-001 through 004. In fact, TPL Standards do not specify a time-duration allowed for manual adjustment in Category C3.

In addition, NERC Standard TOP-STD-007-1 (http://www.nerc.com/files/TOP-007-WECC-1_Final.pdf) for WECC is applicable to “Transmission Operators for the transmission paths in the most current Table titled “Major WECC Transfer Paths in the Bulk Electric System” provided at: <http://www.wecc.biz/Standards/Approved%20Standards/Supporting%20Tables/Table%20Major%20Paths%204-28-08.pdf>”. This table lists all the Paths for which the manual adjustment time applies, and the 30-minute time for adjustment is not meant to be applied indiscriminately across the board to all facilities.

Furthermore, in the NERC Glossary of Terms, the 30-minutes time for adjustment appears in the definition of Interconnection Reliability Operating Limit T_v (IROL T_v): “The maximum time that an Interconnection Reliability Operating Limit can be violated before the risk to the interconnection or other Reliability Coordinator Area(s) becomes greater than acceptable. Each Interconnection Reliability Operating Limit’s T_v shall be less than or equal to 30 minutes”.

Neither of these standards applies the 30-minutes to the time allowed for manual adjustment of facility loadings beyond those that constitute a violation of an IROL or for facilities that comprise an interconnection between Transmission Operator areas or transfer paths.

By arbitrarily limiting the time allowance for system adjustment to 30 minutes for facilities with that are modeled with 1- to 4-hour emergency ratings, the CAISO is forcing the increased use of SPS to adjust the system. Such increased use of SPS will result in increasingly complex protection system coordination and increases the probability of mis-operation, which in itself can adversely impact system reliability. So, by avoiding the risk of non-compliance with NERC Standards, the CAISO may inadvertently reduce the reliability to load and potentially reduce deliverability of generation projects. BSE therefore urges the CAISO to reconsider the requirement of limiting manual adjustment to 30 minutes except for those facilities, the loss of which is shown through simulation to result in wide spread or cascading outages.

We appreciate the opportunity to comment.